

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**DaimlerChrysler Corporation
Kokomo Transmission Plant, Plt ID 067-00003
2401 S. Reed Road
Kokomo, Indiana 46904**

and

**DaimlerChrysler Corporation
Kokomo Casting Plant, Plt ID 067-00002
1001 East Boulevard
Kokomo, Indiana 46904**

(DaimlerChrysler Corporation, Kokomo Casting Plant was issued a separate Title V permit, T067-5246-00065. Each is considered part of one Title V major source)

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T067-6504-00065	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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Natural Gas Fired Boiler Certification
Monthly Report Form
Quarterly Report Form
Quarterly Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates machining, cleaning, and heat treating facilities to produce transmissions for use in automobiles and light duty trucks. The DaimlerChrysler Corporation Kokomo Transmission Plant and DaimlerChrysler Corporation Kokomo Casting Plant have been considered a single Title V major source. The combined source ID for the source is 067-00065.

Responsible Official:	Kenneth Moore
Source Address:	DaimlerChrysler Corporation Kokomo Transmission Plant 2401 S. Reed Road, Kokomo, Indiana 46904
Source Address:	DaimlerChrysler Corporation Kokomo Casting Plant 1001 East Boulevard, Kokomo, Indiana 46904
Mailing Address:	DaimlerChrysler Corporation, P.O. Box 9007 Kokomo, Indiana 46904-9007
SIC Code:	3714
County Location:	Howard
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

The Permittee owns and operates machining, cleaning, and heat treating facilities to produce transmissions for use in automobiles and light duty trucks. The DaimlerChrysler Corporation Kokomo Transmission Plant and DaimlerChrysler Corporation Kokomo Casting Plant have been considered a single Title V major source. The DaimlerChrysler Corporation Kokomo Casting Plant was issued a separate Title V permit under the Part 70 No. T067-5246-00065.

This DaimlerChrysler Corporation Kokomo Transmission Plant consists of the following emission units and pollution control devices:

1. One (1) spreader stoker boiler, identified as boiler 1, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.
2. One (1) spreader stoker boiler, identified as boiler 2, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.
3. One (1) spreader stoker boiler, identified as boiler 3, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.

4. One (1) boiler, identified as boiler 4, segment ID 1, fueled by reclaimed residual oil, and segment ID 2, fueled by natural gas, maximum heat capacity is 90 MMBtu per hour, and exhausting to the common stack boiler.
5. One (1) boiler, identified as boiler 5, segment ID 1, fueled by natural gas, maximum heat capacity is 120 MMBtu per hour, and exhausting to the common stack boiler.
6. One (1) pneumatic shot blasting, identified as 324739, segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.
7. One (1) pneumatic shot blasting, identified as AC- NK8991, segment ID 1, media used is walnut shell, using a wet scrubber as control and exhausting to a stack.
8. One (1) pneumatic shot blasting, identified as NK5448, segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.
9. Four (4) pneumatic shot blasting, identified as 180732, 132641, 180532, 180548 segment ID 2, media used is steel shot, using a wet scrubber to control facilities 132641, 180532, 180548 and a baghouse to control facility 180732, and exhausting to a stack.
10. One (1) pneumatic shot blasting, identified as 199672, segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.
11. One (1) pneumatic shot blasting, identified as 132544, segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.
12. Two (2) pneumatic shot blasting, identified as 220554, and 220544 segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.
13. Four (4) reciprocating internal combustion engines, identified as dyna, segment ID 1, fueled by gasoline, combined heat capacity is 16.8 MMBtu per hour and exhausting to stacks.
14. Several cold cleaner basins, identified as CC, segment ID 1, solvent used is stoddard, agitation method is manual dip and/or spray, a lid is used as control when the degreasing operation is not in use.
15. Maintenance painting, identified as MAINTPT, segment ID 1.
16. One (1) Wheelabrator Multi table Shotblast Deburr identified as AAA006276, media used is steel shot, recirculation rate is 48,000 pounds per hour, using a wet scrubber for control.
17. One (1) Wheelabrator #22 Super III Tumblast identified as AAA012334, media used is steel shot, recirculation rate is 56,760 pounds per hour, using a wet scrubber for control.
18. One (1) Engineered Abrasive Shot Blaster identified as AAA018493, media used is steel shot, recirculation rate is 80 pounds per hour, using a cartridge bag house for control and exhausting inside the plant;
19. One (1) Engineered Abrasive Shot Blaster identified as AAA018494, media used is steel shot, recirculation rate is 80 pounds per hour, using a wet scrubber for control.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

1. Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour.
2. Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
3. Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.
4. Combustion source flame safety purging on startup.
5. A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
6. A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
7. The following VOC and HAP storage container: Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
8. Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
9. Closed loop heating and cooling systems.
10. Groundwater oil recovery wells.
11. Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
12. Any operation using aqueous solutions containing less than 1% by weight of VOC's, excluding HAPs.
13. Forced and induced draft cooling tower system not regulated under a NESHAP.
14. Quenching operations used with heat treating processes.
15. Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
16. Heat exchanger cleaning and repair.
17. Stockpiled soils from soil remediation activities that are covered and waiting transportation for disposal.

18. Paved and unpaved roads and parking lots with public access.
19. Covered conveyors for coal or coke conveying less than or equal to 360 tons per day.
20. Uncovered coal conveying of less than or equal to 120 tons per day.
21. Underground conveyors.
22. Coal bunker and coal scale exhausts and associated dust collector vents.
23. Asbestos abatement projects regulated by 326 IAC 14-10.
24. Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
25. Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
26. Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
27. Gasoline generators not exceeding 110 horsepower.
28. Diesel generators not exceeding 1600 horsepower.
29. Stationary fire pumps.
30. Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
31. Filter or coalescer media change out.
32. Vents from ash transport systems not operated at positive pressure.
33. A laboratory as defined in 326 IAC 2-7-1 (20)(c).
34. Metal Cleaning - Powder Cleaner
35. Metal Cleaning - Acid/Caustic Cleaner
36. Abrasive Cleaning - Deburring Liquid
37. Production Welding
38. Gasoline Storage
39. Diesel Storage
40. Reclaimed Oil Storage

- 41. Tinning
- 42. WWTP Sulfuric Acid Storage
- 43. Ink usage, identified as ink, segment ID 1.
- 44. Floor cleaner, identified as MAINTFC, segment ID 1.
- 45. Multiple individual machining operations, identified as MACH, segment ID 1, consisting of an oil mist from cutting oil, synthetic grinding coolant, and drilling oil, using air washers (scrubbers), and dust collectors as control.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon receipt of a written request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit;
or

- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year, unless a different schedule is allowed by 326 IAC 2-7-19.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) The DaimlerChrysler Corporation Kokomo Transmission Plant and the DaimlerChrysler Corporation Kokomo Casting Plant have been determined to be one source for Title V, separate Title V permits have been issued for administrative purposes. DaimlerChrysler Corporation Kokomo Casting Plant was issued Title V permit, 067-5246-00002. The emissions information for each plant shall be submitted on separate emissions statements. The emission statement submitted by DaimlerChrysler Corporation Kokomo Transmission Plant shall include the original plant ID of 067-00002 and the combined source plant ID of 067-00065.

C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) spreader stoker boiler, identified as Boiler 1, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.

One (1) spreader stoker boiler, identified as Boiler 2, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.

One (1) spreader stoker boiler, identified as Boiler 3, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, a using cyclone as control, exhausting to the common stack boiler.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 326 IAC 6-1-15 Nonattainment area particulate limitations: Howard County

Pursuant to 326 IAC 6-1-15 (Howard County) particulate emissions shall be limited to 875.7 tons per year and 0.75 pounds per million Btu for Boiler 1, Boiler 2, Boiler 3, Boiler 4 and Boiler 5.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from each MM 47 Btu per hour coal fired boilers shall not exceed six (6.0) pounds per MMBtu heat input. Based on a heating value of 11,943 Btu per 1 pound of coal, the fuel sulfur content of the coal used for fuel shall be limited to 3.8 percent (%).

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.1.4 Nonapplicable Requirements [326 IAC 2-7-5 (a)(2)]

The requirements that are not applicable to this boiler in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) Boiler 1, Boiler 2, and Boiler 3 are exempt from 40 CFR Part 60.40c Subpart Dc since the boilers were constructed in 1955 which predates Subpart Dc applicability date of June 9, 1989.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 12 months after issuance of this permit, the Permittee shall perform PM testing simultaneously for Boiler 1, Boiler 2, Boiler 3, Boiler 4 and Boiler 5 utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for Boiler 1, Boiler 2, and Boiler 3.

D.1.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(A)] [326 IAC 2-7-6]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing one of the following options:

- (a) Coal sampling and analysis shall be performed using one of the following procedures:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:
 - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
 - (B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a)
 - (3) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (b) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]
- (c) Compliance or noncompliance with the emission limitations contained in 326 IAC 7-1.1 or 326 IAC 7-4 can be determined by a stack test in accordance with 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8.

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.1.7 Particulate

The control device shall be in operation at all times when the boilers are in operation and exhausting to the outside atmosphere.

D.1.8 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be compiled on a calendar month basis and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.1.1 and D.1.2.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual coal usage since last compliance determination period;
 - (3) Sulfur content, heat content, and ash content;
 - (4) Sulfur dioxide emission rates.
- (b) Pursuant to 326 IAC 3-7-5(a), owners or operators of sources with total coal-fired capacity greater than or equal to one hundred (100) MMBtu per hour actual heat input shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAM.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 and the tons of coal consumed monthly shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) boiler, identified as Boiler 4, segment ID 1, fueled by reclaimed residual oil, and segment ID 2, fueled by natural gas, maximum heat capacity is 90 MMBtu per hour, and exhausting to the common stack boiler.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-1-15]

Pursuant to 326 IAC 6-1-15 the particulate emissions shall be limited to 875.7 tons per year and 0.75 pounds per million Btu for Boiler 4, and collectively Boiler 1, Boiler 2, Boiler 3, and Boiler 5 specified in sections D.1 and D.4.

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from Boiler 4 shall not exceed 1.6 pounds per MMBtu heat input. Based on a heating value of 140,000 Btu per gallon of oil, the fuel sulfur content of the oil used for fuel shall be limited to 1.5 percent (%).

D.2.3 Nonapplicable Requirements [326 IAC 2-7-5 (a)(2)]

The requirements that are not applicable to this boiler in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) Boiler 4 is exempt from 40 CFR Part 60.40c Subpart Dc since the boiler was constructed in 1964 which predates the Subpart Dc applicability date of June 9, 1989.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

Compliance Determination Requirement

D.2.4 Sulfur Dioxide Emissions and Sulfur Content for reclaimed residual oil

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed one and five-tenths percent (1.5%):

Analyzing the oil sample to determine the sulfur content via the procedures in ASTM test methods as described in 326 IAC 3-3-4(a).

Daily oil samples shall be collected from each tank unless the tank(s) have not been refilled that day. A composite of the samples shall be analyzed on a weekly basis. If the weekly analysis for oil sulfur content is less than or equal to 80% of the 1.5% (1.2%) limit for a one month period then the testing procedures will be changed as follows:

Daily oil samples shall be collected from each tank unless the tank(s) have not been refilled that day. A composite of the samples shall be analyzed on a monthly basis. If the monthly analysis exceeds 80% of the 1.5%(i.e.1.2%sulfur by weight) limit, then weekly analysis will again be required until the sulfur content is less than or equal to 80% of the 1.5% (i.e., 1.2% sulfur by weight) limit for a one month period.

- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from Boiler 4, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM or SO₂ limit specified in Condition D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Fuel usage

When this Boiler 4 is using natural gas as fuel, there are no applicable compliance monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements for reclaimed residual oil

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the boiler's stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported for residual oil.

D.2.10 Natural gas Certification

The natural gas Boiler 4 certification form will document compliance with condition D.2.1 when the Boiler 4 is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.

D.2.11 Used Oil Requirements

The used machining and cutting oil burned in the Boiler 4 shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

- (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),
- (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and
- (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).

The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) boiler, identified as boiler 5, segment ID 1, fueled by natural gas, maximum heat capacity is 120 MMBtu per hour, and exhausting to the common stack boiler.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-1-15]

Pursuant to 326 IAC 6-1-15 the particulate emissions shall be limited to 875.7 tons per year and 0.75 pounds per million Btu for Boiler 5 and collectively Boiler 1, Boiler 2, Boiler 3, and Boiler 4 specified in section D.1, D.2 and D.3.

D.3.2 Nonapplicable Requirements [326 IAC 2-7-5 (a)(2)]

The requirements that are not applicable to this boiler in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) Boiler 5 is exempt from 40 CFR Part 60.40c Subpart Dc since the boiler was constructed in 1965 which predates the Subpart Dc applicability date of June 9, 1989.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

Compliance Determination Requirement

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.3.4 Fuel usage

The Boiler 5 is using natural gas fuel only, thus there are no applicable compliance monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.5 Natural gas Certification

The natural gas Boiler 5 certification form will document compliance with condition D.3.1 when the Boiler 5 is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) pneumatic shot blasting, identified as AC- NK8991, segment ID 1, media used is walnut shell, using a wet scrubber as control and exhausting to a stack.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blaster shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process/Facility	Process Exhaust (scfm)	PM/PM ₁₀ Allowable Emissions (lbs/hr)	Rule Requirement gr/dscf
Shot Blaster AC- NK8991	16,000	4.1	0.03

D.4.2 Nonapplicable Requirements [326 IAC 2-7-5 (a)(2)]

The requirements that are not applicable to this shot blaster in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) 326 IAC 6-3 (Process Operations), is not applicable because sources or facilities that are located in the nonattainment counties listed in 326 IAC 6-1-7 and have potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year, shall comply with the limitations of 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified) rather than 326 IAC 6-3 (Process Operations).

Compliance Determination Requirement

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.4 Wet Scrubber Operations

The wet scrubber, for particulate matter control shall be in operation at all times when the shot blaster is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.4.5 Scrubber Operation

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.
- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (d) In the event that a scrubber's failure has been observed:

The affected process will be shut down immediately until the failed unit has been replaced or repaired.

D.4.6 Visible Emissions Notations

- (a) Daily visible emission notations of the associated control device's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.6, the Permittee shall maintain records of daily visible emission notations as specified under Condition D.4.6.
- (b) To document compliance with Condition D.4.5, the Permittee shall maintain records of the wet scrubber operations as specified under Condition D.4.5.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) pneumatic shot blasting, identified as NK5448, segment ID 2, media used is steel shot, shot circulation rate is 18 tons per hour, using wet scrubber for control. (Installation date is 1965.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2] PSD [326 IAC 2-2]

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blaster shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process/Facility	Process Exhaust (scfm)	PM/PM ₁₀ Allowable Emissions (lbs/hr)	Rule Requirement gr/dscf
Shot Blaster NK5448	16,000	4.1	0.03

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.5.3 Nonapplicable Requirements [326 IAC 2-7-5 (a)(2)]

The requirements that are not applicable to this shot blaster in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

There are no New Source Performance Standards (326 IAC 12) applicable to this source.

Compliance Determination Requirement

D.5.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.5 Wet Scrubber Operations

The wet scrubber, for particulate matter control shall be in operation at all times when the shot blaster is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.5.6 Scrubber Operation

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.

- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (d) In the event that a scrubber's failure has been observed:

The affected process will be shut down immediately until the failed unit has been replaced or repaired.

D.5.7 Visible Emissions Notations

- (a) Daily visible emission notations of the associated control device's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.8 Record Keeping Requirements

- (a) To document compliance with Condition D.5.7, the Permittee shall maintain records of daily visible emission notations as specified under Condition D.5.7.
- (b) To document compliance with Condition D.5.6, the Permittee shall maintain records of the results of the inspections required under Condition D.5.6.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.9 Reporting Requirements

A summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, upon request.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Four (4) pneumatic shot blasting, identified as 180732, 132641, 180532, 180548 segment ID 2, media used is steel shot, using a wet scrubber to control facilities 132641, 180532, 180548 and a baghouse to control facility 180732, and exhausting to a stack. (Installation date is December 1977.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blasters shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process/Facility	Process Exhaust (scfm)	PM/PM ₁₀ Allowable Emissions (lbs/hr)	Rule Requirement gr/dscf
Shot Blaster 180732	4,000	1.0	0.03
Shot Blaster 132641	16,000	4.1	0.03
Shot Blaster 180532		4.1	0.03
Shot Blaster 180548		4.1	0.03

D.6.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The total potential to emit particulate matter emissions are less than 25 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.6.4 Nonapplicable Requirements [326 IAC 2-7-5 (a)(2)]

The requirements that are not applicable to these shot blasters in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

There are no New Source Performance Standards (326 IAC 12) applicable to this source.

Compliance Determination Requirement

D.6.5 Testing Requirements [326 IAC 2-7-6(1)]

During the period within 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for any one of the shotblast units identified as 180732, 132641, 180532, or 180548.

D.6.6 Wet Scrubber Operation

The wet scrubber, for particulate matter control shall be in operation at all times when the shot blaster is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.6.7 Scrubber Operation

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.
- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (d) In the event that a scrubber's failure has been observed:

The affected process will be shut down immediately until the failed unit has been replaced or repaired.

D.6.8 Visible Emissions Notations

- (a) Daily visible emission notations of the associated control device's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.6.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags (or paper cartridge filters) controlling the associated shot blasting operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.6.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5 (3)]

D.6.11 Record Keeping Requirements

- (a) To document compliance with Condition D.6.7, the Permittee shall maintain records of daily visible emission notations as specified under Condition D.6.7.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain records of the results of the inspections required under Condition D.6.6.
- (c) To document compliance with Condition D.6.8, the Permittee shall maintain records of the results of the inspections required under Condition D.6.8.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.12 Reporting Requirements

A summary of the information to document compliance with Condition D.6.1 shall be submitted to the address listed in Section C - General Reporting Requirements, upon request.

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) pneumatic shot blasting, identified as 324739, segment ID 2, media used is steel shot, shot circulation rate is 24 tons per hour, using wet scrubber for control. (Installation date is September, 1998).

One (1) pneumatic shot blasting, identified as 199672, segment ID 2, media used is steel shot, shot circulation rate is 18 tons per hour, using wet scrubber for control. (Installation date is April 1984.)

One (1) pneumatic shot blasting, identified as 132544, segment ID 2, media used is steel shot, shot circulation rate is 18 tons per hour, using wet scrubber for control. (Installation date is April 1985.)

Two (2) pneumatic shot blasting, identified as 220554, and 220544 segment ID 2, media used is steel shot, shot circulation rate is 18 tons per hour, using wet scrubber for control. (Installation date is May 1988.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blasters shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process/Facility	Process Exhaust (scfm)	PM/PM ₁₀ Allowable Emissions (lbs/hr)	Rule Requirement gr/dscf
Shot Blaster 324739	16,000	4.1	0.03
Shot Blaster 199672	16,000	4.1	0.03
Shot Blaster 132544	16,000	4.1	0.03
Shot Blaster 220554	16,000	4.1	0.03
Shot Blaster 220544	16,000	4.1	0.03

D.7.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The total potential to emit particulate matter emissions are less than 25 tons per year and the total PM 10 emissions from the shot blaster unit identified as 324739 is less than 15 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

D.7.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.7.4 Nonapplicable Requirements [326 IAC 2-7-5 (a)(2)]

The requirements that are not applicable to these shot blasters in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

There are no New Source Performance Standards (326 IAC 12) applicable to this source.

Compliance Determination Requirement

D.7.5 Particulate Matter

- (a) Pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements), as stated in OP 067-6375, issued on November 11, 1996, compliance stack tests shall be performed for the wet scrubber controlling shotblast machine 324739, within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. These tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.
- (b) The Office of Air Management (OAM) shall be notified of the actual test date at least two (2) weeks prior to the date, a test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAM within 45 days of completion of the testing, pursuant to that rule.

D.7.6 Testing Requirements [326 IAC 2-7-6(1)]

During the period within 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for any one of the shotblast units identified as 220554, and 220544.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.7.7 Visible Emissions Notations

- (a) Daily visible emission notations of the associated control device's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.7.8 Scrubber Operation

That the scrubber shall be operated at all times when the pneumatic shot blasting machines are in operation.

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop and flow rate of the scrubber shall be maintained at a range of 8 to 12 inches of water and 730 gallons per minute, respectively. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.

- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (d) In the event that a scrubber's failure has been observed:

The affected process will be shut down immediately until the failed unit has been replaced or repaired.

Record Keeping and Reporting Requirements [326 IAC 2-7-5 (3)]

D.7.9 Record Keeping Requirements

- (a) To document compliance with Condition D.7.6, the Permittee shall maintain records of daily visible emission notations as specified under Condition D.7.6.
- (b) To document compliance with Condition D.7.7, the Permittee shall maintain records of the results of the inspections required under Condition D.7.7.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.8

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Several cold cleaner basins, identified as CC, segment ID 1, solvent used is stoddard, agitation method is manual dip and/or spray, a lid is used as control when the degreasing operation is not in use.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.8.2 Nonapplicable Requirements [326 IAC 2-7-5 (a)(2)]

The requirements that are not applicable to these cold cleaners in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) The solvent basins, ID CC, segment ID 1, are exempt from 40 CFR 63 Subpart T since the solvent does not contain any of the cleaning solvents mentioned in the rule.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

Compliance Determination Requirements

D.8.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.9

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

16. One (1) Wheelabrator Multi table Shotblast Deburr identified as AAA006276, media used is steel shot, recirculation rate is 48,000 pounds per hour, using a wet scrubber for control.
17. One (1) Wheelabrator #22 Super III Tumblast identified as AAA012334, media used is steel shot, recirculation rate is 56,760 pounds per hour, using a wet scrubber for control.
18. One (1) Engineered Abrasive Shot Blaster identified as AAA018493, media used is steel shot, recirculation rate is 80 pounds per hour, using a cartridge bag house for control and exhausting inside the plant;
19. One (1) Engineered Abrasive Shot Blaster identified as AAA018494, media used is steel shot, recirculation rate is 80 pounds per hour, using a wet scrubber for control.

Emission Limitations and Standards

D.9.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blasters shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process / Facility	Process Exhaust (scfm)	PM / PM ₁₀ Allowable Emissions (lbs/hr)	Rule Requirement gr/dscf
Wheelabrator Shot Blaster Deburr (ID. #AAA006276)	4,350	1.08	0.03
Wheelabrator #22 Super III Tumblast (ID. #AAA012334)	16,000	1.3	0.03
Engineered Abrasive Shot Blaster (ID. # AAA018494)		0.13	0.03
Engineered Abrasive Shot Blaster (ID. # AAA018493)	2,000	0.06	0.03

D.9.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The total potential to emit particulate matter emissions are less than 25 tons per year and 15 tons per year of PM 10 emissions. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

Compliance Determination Requirements

D.9.3 Testing Requirements [326 IAC 2-1-3]

Within 60 days after achieving maximum production rate but no later than 180 days after initial start-up, the Permittee shall perform particulate matter (PM) and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance. The PM and PM-10 emission limits specified in Condition D.9.1 for Wheelabrator Shot Blaster Debur (ID. # AAA006276), Wheelabrator # 22 Super III Tumblast (ID.# AAA012334), Engineered and Abrasive Shot Blaster (ID. # AAA018494), shall be determined by a compliance stack test conducted in accordance with Section C - Performance Testing.

D.9.4 Particulate Matter (PM)

- (a) The wet scrubber(s) for PM control shall be in operation at all times when the associated shot blasting machines are in operation and exhausting to the outside atmosphere.
- (b) The Cartridge Bag House for PM control shall be in operation at all times when the associated shot blasting machine is in operation and exhausting to inside the plant.

Compliance Monitoring Requirements

D.9.5 Visible Emissions Notations

- (a) Daily visible emission notations of the facilities identified as Wheelabrator Multitable Shot Blaster (AAA0006276), Wheelabrator #22 Super III Tumblast (AAA012334), and Engineered Abrasive Shot Blaster (AAA018494) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

D.9.6 Wet Scrubber Operating Condition

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber(s) controlling PM emissions from the shot blasting units at least once per week. The Compliance Response Plan for the scrubbers shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.
- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

- (c) An inspection shall be performed each calendar quarter of the scrubbers. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (d) In the event that a scrubber's failure has been observed:
 - (i) The affected process will be shut down immediately until the failed unit has been replaced or repaired.

D.9.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags (or paper cartridge filters) controlling the associated shot blasting operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.9.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement

D.9.9 Record Keeping Requirements

- (a) To document compliance with Condition D.9.4, the Permittee shall maintain records of daily visible emission notations of the facilities identified as Wheelabrator Multitab Shot blast (AAA006276), Wheelabrator #22 Super III Tumbblast (AAA012334), and Engineered Abrasive Shot Blaster (AAA018494) stack exhaust.
- (b) To document compliance with Condition D.9.5, the Permittee shall maintain records of the results of the inspections required under Condition D.9.5.
- (c) To document compliance with Condition D.9.6, the Permittee shall maintain records of the results of the inspections required under Condition D.9.6.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: DaimlerChrysler Corporation - Kokomo Transmission Plant
Source Address: 2401 S. Reed Road, Kokomo, IN 46904
Mailing Address: P.O. Box 9007, Kokomo, IN 46904-9007
Part 70 Permit No.: T 067-6375-00065

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: DaimlerChrysler Corporation - Kokomo Transmission Plant
Source Address: 2401 S. Reed Road, Kokomo, IN 46904
Mailing Address: P.O. Box 9007, Kokomo, IN 46904-9007
Part 70 Permit No.: T 067-6375-00065

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: DaimlerChrysler Corporation - Kokomo Transmission Plant
Source Address: 2401 S. Reed Road, Kokomo, IN 46904
Mailing Address: P.O. Box 9007, Kokomo, IN 46904-9007
Part 70 Permit No.: T 067-6375-00065

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Monthly Report

Source Name: DaimlerChrysler Corporation - Kokomo Transmission Plant
Source Address: 2401 S. Reed Road, Kokomo, IN 46904
Mailing Address: P.O. Box 9007, Kokomo, IN 46904-9007
Part 70 Permit No.: T 067-6375-00065
Facility: Boilers 1, 2, and 3
Parameter: SO2
Limit: 6.0 lb/MMBtu

YEAR: _____

Month	Actual Usage (tons)	Average Sulfur content (%S by weight)	Average higher heating value (MMBtu/lb)	SO2 Emissions (lbs SO2/MMBtu)
Boiler 1 - Boiler 2 - Boiler 3 -				
Boiler 1 - Boiler 2 - Boiler 3 -				
Boiler 1 - Boiler 2 - Boiler 3 -				

Calendar Month average:

$$\text{lbs SO}_2/\text{MMBtu} = \frac{38 * \text{monthly average \% sulfur content}}{\text{monthly average MMBtu/ton coal}}$$

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: DaimlerChrysler Corporation - Kokomo Transmission Plant
Source Address: 2401 S. Reed Road, Kokomo, IN 46904
Mailing Address: P.O. Box 9007, Kokomo, IN 46904-9007
Part 70 Permit No.: T 067-6375-00065
Facility: Boilers 1, 2, 3, 4 and 5
Parameter: PM
Limit: Total particulate matter emissions for boilers 1, 2,3, 4, and 5 shall be limited to 875.7 tons/yr.

YEAR _____

Month	Coal usage (Tons)	Residual oil (kgal)	Natural gas (MMCF)	PM emission from coal (Tons) ^a	PM emission from oil (Tons) ^b	PM emission from natural gas (Tons) ^c
1						
2						
3						

Month	Total PM (monthly)	Total PM (11 months)	Total PM Emissions (month)*
1			
2			
3			

* Total PM emissions (month) = Total PM (monthly) + Total PM (11 months)

a = tons x lbs/ton / 2000 lbs/ton= tons PM/month

b = kgal x lbs/kgal x 2000 lbs/ton = ton PM/month

c = MMCF x lbs/MMCF / 2000 lbs/ton = ton PM/month

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: DaimlerChrysler Corporation - Kokomo Transmission Plant
Source Address: 2401 S. Reed Road, Kokomo, IN 46904
Mailing Address: P.O. Box 9007, Kokomo, IN 46904-9007
Part 70 Permit No.: T 067-6375-00065

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Operating Permit
and Enhanced New Source Review (ENSR)**

Source Background and Description

Source Name: Chrysler Corporation
Source Address: Chrysler Kokomo Transmission Plant
2401 S. Reed Road, Kokomo, Indiana 46904
Source Address: Chrysler Kokomo Casting Plant
1001 East Boulevard, Kokomo, Indiana 46904
County: Howard
SIC Code: 3714
Operation Permit No.: T067-6504-00005
Permit Reviewer: Peggy Zukas

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Chrysler Corporation relating to the operation of machining, cleaning, heat treating and marking facilities to produce transmissions for use in automobiles and light duty trucks.

Source Definition

The operation of machining, cleaning, heat treating and marking facilities to produce transmissions for use in automobiles and light duty trucks company consists of two (2) plants: The Chrysler Kokomo Transmission Plant has been combined with the Chrysler Kokomo Casting Plant as one Title V source. The Chrysler Kokomo Casting Plant was issued a separate Title V permit under the Part 70 No. T067-5246-00005.

- (1) Plant 1 is located at Kokomo Transmission Plant (KTP), 2401 S. Reed Road, Kokomo, IN 46904 ; and
- (2) Plant 2 is located at Kokomo Casting Plant (KCP), 1001 East Boulevard, Kokomo, IN 46904.

The following explains why Plant 1 and Plant 2 are combined sources:

OAM shall consider KTP and KCP as one source because plants KTP and KCP are under common control, KCP is acting as a support facility for KTP, and the plants are located on contiguous properties.

The Indiana Transmission Plant (ITP) will be considered a separate source because it is approximately six (6) miles from KCP and KTP. Furthermore, approximately 0.1 percent and 23 percent of supplies from KTP and KCP, respectively, are sent to Indiana Transmissions Plant.

Separate Part 70 permits will be issued to Chrysler Corporation, Kokomo Transmission Plant and Chrysler Corporation, Kokomo Casting Plant.

Permitted Emission Units and Pollution Control Equipment

1. One (1) spreader stoker boiler, identified as boiler 1, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.
2. One (1) spreader stoker boiler, identified as boiler 2, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.
3. One (1) spreader stoker boiler, identified as boiler 3, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.
4. One (1) boiler, identified as boiler 4, segment ID 1, fueled by reclaimed residual oil, and segment ID 2, fueled by natural gas, maximum heat capacity is 90 MMBtu per hour, and exhausting to stack boiler.
5. One (1) boiler, identified as boiler 5, segment ID 1, fueled by natural gas, maximum heat capacity is 120 MMBtu per hour, and exhausting to the common stack boiler.

Note: The four (4) electric salt furnaces, segment ID 2, using one (1) baghouse per two furnaces for control have been removed from operations.

6. One (1) pneumatic shot blasting, identified as 324739, segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.

Unpermitted Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

1. Approximately 900 individual machining operations, identified as MACH, segment ID 1, consisting of an oil mist from cutting oil, synthetic grinding coolant, and drilling oil, using air washers (scrubbers), and dust collectors as control.
2. Cutting oil used in machining, identified as MACH, segment ID 2.
3. One (1) pneumatic shot blasting, identified as AC- NK8991, segment ID 1, media used is walnut shell, using a wet scrubber as control and exhausting to a stack.
4. One (1) pneumatic shot blasting, identified as NK5448, segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.
5. Four (4) pneumatic shot blasting, identified as 180732, 132841, 180532, 180548 segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.
6. One (1) pneumatic shot blasting, identified as 199672, segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.
7. One (1) pneumatic shot blasting, identified as 132544, segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.

8. Two (2) pneumatic shot blasting, identified as 220554, and 220545 segment ID 2, media used is steel shot, using wet scrubber for control and exhausting to a stack.
9. Six (6) reciprocating internal combustion engines, identified as dyna, segment ID 1, fueled by gasoline, combined heat capacity is 16.8 MMBtu per hour and exhausting to stacks.
10. Several cold cleaner basins, identified as CC, segment ID 1, solvent used is stoddard, agitation method is manual dip and/or spray, a lid is used as control when the degreasing operation is not in use.
11. Forty (40) heaters, segment ID 1, fueled by natural gas, combined maximum heat capacity is 77.76 MMBtu per hour.

Existing Approvals

The source has been operating under the following approvals:

- (1) CP 067-6375-00003, issued on November 12, 1996,
- (2) CP 067-4933-00003, issued on December 19, 1995,
- (3) OP 34-10-94-0290, issued on January 2, 1990,
- (4) OP 34-10-94-0291, issued on January 2, 1990,
- (5) OP 34-10-94-0292, issued on January 2, 1990,
- (6) OP 34-10-94-0293, issued on January 2, 1990,
- (7) OP 34-10-94-0294, issued on January 2, 1990,
- (8) Registration, number not provided, issued on January 19, 1988,*
- (9) Amendment to Operation Permit, issued on May 20, 1985,
- (10) Exemption, number not provided, issued on June 10, 1985,
- (11) Amendment to Exemption, issued on November 25, 1985,
- (12) Registration, number not provided, issued on April 16, 1984,
- (13) Amendment to Operation Permit, issued on May 1, 1984,
- (14) OP 34-10-86-0257, issued on November 29, 1982,
- (15) CP (34) 1437, issued on August 20, 1979,
- (16) CP (34) 1367, issued on March 1, 1979, and
- (17) OP 34-10-82-0209, issued on October 17, 1978.

* OAM received a letter from Chrysler on January 9, 1998 requesting to void the registration permit dated January 19, 1988 because the operating units, and the baghouse have been removed from the operations, and have been disposed of off-site.

None of the permits mentioned above were PSD permits.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) CP 067-6375-00003, issued on November 12, 1996

Condition 12:

That the existing wet scrubber shall be operated at all times when the Multitable Shotblast Machine is in operation. The pressure drop and flow rate of the scrubber or appropriate parameters determined in the compliance stack tests (described in Operation Condition 7) necessary to limit particulate matter emissions to 3.7 pounds per hour and PM₁₀ emissions to 3.2 pounds per hour shall be monitored and recorded. Records shall be maintained at the source for a minimum period of three (3) years and be made available upon request of the Office of Air Management (OAM). Maintenance plans as submitted to IDEM on August 6, 1996, shall be initiated when the monitored parameters deviates from its normal average.

Reason not incorporated:

The PM of limit of 3.7 pounds per hour was incorrect. The PM limit shall be 5.5 pounds per hour. Since the potential emissions for PM are greater than the major threshold of 25 tons per year, the shot blast emissions have been limited to less than 25 tons per year which calculates to 5.5 pounds per hour of PM. There was no change to the PM-10 limit of 3.2 pounds per hour because in order to avoid PSD requirement, the PM-10 emissions from the shot blaster were correctly limited to less than 15 tons per year.

Enforcement Issue:

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
1. Approximately 900 individual machining operations are attached to control devices, identified as MACH, segment ID 1 oil mist from cutting oil, synthetic grinding coolant , and drilling oil.
 2. Cutting oil used in machining, identified as MACH, segment ID 2.
 3. One (1) pneumatic shot blasting, segment ID 1, media used is walnut shell, using a wet scrubber as control and exhausting to stack.
 4. One (1) pneumatic shot blasting, segment ID 2, media used is steel shot, using wet scrubber for control. (Installation date is 1965.)
 5. Four (4) pneumatic shot blasting, segment ID 2, media used is steel shot, using wet scrubber for control. (Installation date is December 1977.)
 6. One (1) pneumatic shot blasting, segment ID 2, media used is steel shot, using wet scrubber for control. (Installation date is April 1984.)
 7. One (1) pneumatic shot blasting, segment ID 2, media used is steel shot, using wet scrubber for control. (Installation date is April 1985.)

8. Two (2) pneumatic shot blasting, segment ID 2, media used is steel shot, using wet scrubber for control. (Installation date is May 1988.)
 9. Six (6) reciprocating internal combustion engine, identified as dyna, segment ID 1, fueled by gasoline, combined heat capacity is 16.8 MMBtu per hour.
 10. Several cold cleaner basins, identified as CC, segment ID 1, solvent used is stoddard, agitation method is manual dip and/or spray, using a lid when operation is not in use as control.
 11. Forty (40) heaters, segment ID 1, fueled by natural gas, combined maximum heat capacity is 77.76 MMBtu per hour.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on September 4, 1996.

A notice of completeness letter was mailed to the company on November 5, 1996.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (8 pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility." The following are combined emissions from the KTP and KCP.

Pollutant	Potential Emissions (tons/year) for KTP	Potential Emissions (tons/year) for KCP	Potential Emissions (tons/year) Total emissions from KTP and KCP
PM	greater than 250	greater than 250	greater than 250
PM-10	greater than 250	greater than 250	greater than 250
SO ₂	greater than 250	less than 100	greater than 250
VOC	greater than 250	less than 100	greater than 250
CO	greater than 250	less than 100	greater than 250
NO _x	greater than 250	greater than 250	greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year) for KTP	HAP's	Potential Emissions (tons/year) for KCP
HCL	greater than 10	Formaldehyde	less than 10
Ammonia	less than 10	Diethanolamine	less than 10
Glycol Ethers	greater than 10	Xylene	less than 10
Benzene	less than 10	Toluene	less than 10
Ethylbenzene	less than 10	Ethylbenzene	less than 10
Toluene	less than 10	Co compounds	less than 10
Xylene	less than 10	Glycol Ethers	less than 10
Lead	less than 10	Manganese	less than 10
MTBE	less than 10	Chromium compounds	less than 10
Arsenic	less than 10	Nickel compounds	less than 10
Cadmium	less than 10		
Chromium compounds	less than 10		
Formaldehyde	less than 10		
Manganese	less than 10		
POM	less than 10		
TOTAL	greater than 25	Total	Less than 25

- (a) The potential emissions (as defined in the Indiana Rule) of criteria pollutants are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions:
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1995 emission data.

Pollutant	Actual Emissions (tons/year) KTP	Pollutant	Actual Emissions (tons/year) KCP
PM	154.7	PM	76.8
PM-10	72.9	PM-10	64.1
SO ₂	574.9	SO ₂	1.5
VOC	57.9	VOC	50.6
CO	165.9	CO	0.001
NO _x	221.8	NO _x	43.6
HCL	16.0	Formaldehyde	0.109
Ammonia	0.000001	Diethanolamine	0.187
Glycol Ethers	4.1	Xylene	0.135
Benzene	0.2	Toluene	0.003
Ethylbenzene	0.008	Ethylbenzene	0.001
Toluene	0.05	Co compounds	0.010
Xylene	0.1	Glycol Ethers	4.568
Lead	0.02	Manganese	0.006
MTBE	0.02	Chromium compounds	0.0003
Arsenic	0.02	Nickel compounds	0.0004
Cadmium	0.001		
Chromium compounds	0.1		
Formaldehyde	0.2		
Manganese	1.3		
POM	0.002		

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

Limited Potential to Emit							
Process/ facility	PM	PM-10	SO ₂	VOC	C O	NO _x	HAP
*Boiler 1, *Boiler 2, and *Boiler 3	0.75 lbs/MMBtu of heat input		6.0 lbs/MMBtu's of heat input				
*Boiler 4	0.75 lbs/MMBtu of heat input	0.75 lbs/MMBtu of heat input	reclaimed oil 1.6 lb/MMBtu				
*Boiler 5	0.75 lb/MMBtu	0.75 lb/MMBtu					
Oil mist Mach- Segment ID -1	34.25 lbs/hr						
Walnut Shell abrasive cleaning Factor AS-2	4.52 lbs/hr						
Multitable Steel Shotblast Machine Brass tag # 324739, 199672, 132544, 220554, 220545, 324739	5.5 lbs/hr	3.2 lbs/hr					
Steel Shotblast Machine NK5448, 180732, 132841, 180548	NK 5448 - 29 lbs/hr 180732 - 5.5 lbs/hr 132841 - 5.5 lbs/hr 180548 - 5.5 lbs/hr						

* PM = 875 tons/yr, pursuant to 326 IAC 6-1-15.

County Attainment Status

The source is located in Howard County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO _x	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.
- (c) 40 CFR 63 Subpart T (National Emission Standards for Halogenated Solvent Cleaning)
The solvent basins, ID CC, segment ID 1, are exempt from this rule since the solvent does not contain any of the cleaning solvent mentioned in the rule.
- (d) 40 CFR Part 60.40c Subpart Dc
Boilers 1, 2, and 3 are exempt from Subpart Dc since the boilers were constructed in 1955 which predates the Subpart Dc applicability date of June 9, 1989.
- (e) 40 CFR Part 60.40c Subpart Dc
Boiler 4 is exempt from Subpart Dc since the boiler was constructed in 1964 which predates the Subpart Dc applicability date of June 9, 1989.
- (f) 40 CFR Part 60.40c Subpart Dc
Boiler 5 is exempt from Subpart Dc since the boiler was constructed in 1965 which predates the Subpart Dc applicability date of June 9, 1989.

State Rule Applicability - Entire Source

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 and CFR 52.21(Prevention of Significant Deterioration), this source is a major source because the potential emissions are greater than 250 tons per year. This status includes those activities at the source that are considered insignificant activities. The source shall be allowed to add insignificant activities not already in the permit.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of criteria pollutants. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 8-2-1 Surface coating emission limitations:

This rule does not apply to this source since no surface coating operations exist.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 6-1-15 Nonattainment area particulate limitations: Howard County
Particulate emissions shall be limited to 875.7 tons per year and 0.75 pounds per million Btu for boilers numbered 1, 2, 3, 4 (segment 1 and 2) and 5. See appendix in the TSD for detailed calculation. Based on these calculations, the 5 boilers will comply with the rule.

Calculations:

The Chrysler Corporation is located in an attainment county, Howard County, however, it is listed as one of the sources in rule 326 IAC 6-1-15 which requires Chrysler Corporation to meet a lower PM limit for boilers 1, 2, 3, 4, and 5. Thus, Chrysler Corporation shall meet the requirements of rule 326 IAC 6-1-15 instead of rule 326 IAC 6-2-3.

Boilers	Year constructed	MMBtu/hr	Fuel used
1	1955	47	coal
2	1955	47	coal
3	1955	47	coal
4 seg. 1	1964	90	oil
4 seg. 2	1964	90	natural gas
5	1965	120	natural gas
total		441	

Pursuant to 326 IAC 6-1-15 boilers 1,2,3, 4 (segment 1 and 2), and 5 have been limited to 0.75 pounds of particulate matter emitted per million BTU heat input instead of 0.8 lbs/MMBtu as specified under 326 IAC 6-2. Please refer to the calculations below for details:

On February 26, 1993, OAM received a letter from Chrysler Motors stating that boiler 5 will no longer burn oil. All the plumbing for the oil has been removed. Boiler 5 will only burn natural gas. This fuel change shall meet the PM limit of 0.75 lbs/MMBtu.

Boilers	MMBtu/hr and fuel used	Allowable PM tons/yr	Potential PM tons/yr	Compliance with 326 IAC 6-1-15	Allowable SO2 lbs/MMBtu	Potential SO2 lbs/MMBtu	Compliance with 326 IAC 7-1.1-2
1	47 - coal	154.4	130.6 - after control	yes	6.0	2.3	yes
2	47 - coal	154.4	130.6 - after control	yes	6.0	2.3	yes
3	47 - coal	154.4	130.6 - after control	yes	6.0	2.3	yes
4	90 - oil & NG*	oil - 295.7 NG - 295.7	oil -19.7 - potential NG - 5.4 - potential	yes	oil - 1.6	oil - 1.1	yes
5	120 - NG	394.2	2.6 - potential	yes	-----	-----	-----
	Total Allowable 875.7	>	442.9	yes			

* NG = natural gas

- (b) Sulfur Dioxide (SO2) [326 IAC 7-1.1-1]
Pursuant to 326 IAC 7-1.1 (SO2 Emissions Limitations) the SO2 emissions from each 47MMBtu per hour coal fueled boilers 1, 2, and 3 shall not exceed 6.0 pounds per MMBtu heat input. Based on the calculations in the TSD, boilers 1, 2, and 3 will comply with the rule.
- (c) Sulfur Dioxide (SO2) [326 IAC 7-1.1-1]
Pursuant to 326 IAC 7-1.1 (SO2 Emissions Limitations) the SO2 emissions from 90 MMBtu per hour residual oil-fueled boiler 4, segment ID 1, shall not exceed 1.6 pounds per MMBtu heat input. Based on the calculations in the TSD, boiler 4 will comply with the rule.
- (d) Sulfur Dioxide (SO2) [326 IAC 7-1.1-1]
Pursuant to 326 IAC 7-1.1 (SO2 Emissions Limitations) boiler 5 is exempt from this rule since the boiler is burning natural gas with a heat capacity of 120 MMBtu per hour.
- (e) 326 IAC 8-1-6 General Provisions relating to VOC rules:
The degreasing units identified as CC are exempted from this rule since the degreasing units are subject to 326 IAC 8-3-2.
- (f) 326 IAC 8-3-2 (Cold Cleaner Operation)
326 IAC 8-3-2 is applicable to the degreasing units because the units were installed after January 1, 1980.

NOTE: The Chrysler Corporation has no records of the installation date for the degreasing units. OAM was told by Chrysler that the degreasing units were installed after the year 1979 and before the year 1990. Thus, OAM is using the installation date of January 1, 1980 to determine rule applicability.

- (g) 326 IAC 8-6-1 Organic solvent emission limitations:
The source is exempted from this rule since it was operating before October 7, 1974 with potential emissions from the organic solvent less than 100 tons per year.
- (h) 40 CFR 63 Subpart T (Halogenated Solvent Degreasing)
The degreasing units are not subject to this NESHAP because the solvent used is not a halogenated solvent.
- (i) Since Howard County is now in attainment for PM 326 IAC 6-3 will be applicable to the shot blasters. These shot blasters are not limited under 326 IAC 6-1-15. Only the boilers were specified under 326 IAC 6-1-15.
- (j) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the oil cutting, synthetic grinding coolant, and drilling oil, identified as MACH, segment ID 1 shall not exceed 34.3 lbs/hr pounds per hour when operating at a process weight rate of 5.94 tons/hr.
- (k) The machining lubricant oils are not subject to 326 IAC 8-1-6 because the facilities were constructed in 1979 which is prior the regulated date of January 1, 1980.
- (l) Pneumatic shot blasting, identified as AC- NK8991
Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shot blaster shall not exceed 4.5 pounds per hour when operating at a process weight rate of 1.16 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (m) Pneumatic shot blasting, identified as NK5448, installed in 1965 - predates PSD 2-2
Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shot blaster shall not exceed 29 pounds per hour when operating at a process weight rate of 19 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (n) Four (4) Pneumatic shot blasters, identified as 180732, 132841, 180532, 180548, installed in December 1977 - PSD 2-2 is applicable, predates PM-10 regulations

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each shotblast machine identified as 180732, 132841, 180532, and 180548 shall not exceed 29 pounds per hour when operating at a process weight rate of 19 tons per hour. The wet scrubbers shall be in operation at all times when the shot blasters are in operation.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

In order to avoid PSD requirement, the PM emissions from the shot blasters shall not exceed 5.5 pounds per hour when operating at a process weight rate of 19 tons per hour. The wet scrubbers shall be in operation at all times when the shot blasters are in operation.

The potential controlled emissions for each shot blaster, identified as 180732, 132841, 180532, and 180548 (installed in 1977) is 4.1 tons/yr, which is less than the calculated allowable emissions of 122.6 tons/yr for each shot blaster. Therefore, each shot blaster is in compliance with 326 IAC 6-3 (Process operations: particulate emission limitations). PM emissions will be limited to less than 25 tons/yr therefore, PSD 2-2 is not applicable.

- (o) Pneumatic shot blaster, identified as 324739, installed November 1996 - applicable to PSD 2-2 and PM-10 regulations. (PM -10 regulations final July 31 , 1987)

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate for the shot blast machine identified as 324739 shall not exceed 5.5 pounds per hour when operating at a process weight rate of 24 tons per hour. In order to avoid PSD requirement, the PM emissions from the shot blaster have been limited to less than 25 tons per year. The wet scrubber shall be in operation at all times when the shot blasters are in operation.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Furthermore, the shot blaster identified as 324739 shall not exceed the PM-10 limit of 3.2 pounds per hour when operating at a process weight rate of 24 tons per hour. In order to avoid PSD requirement, the PM-10 emissions from the shot blaster has been limited to less than 15 tons per year.

- (p) Pneumatic shot blaster, identified as 199672, installed April 1984, PSD 2-2 is applicable, predates PM-10 regulations

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate for the shot blast machine identified as 199672 shall not exceed 29 pounds per hour when operating at a process weight rate of 19 tons per hour. The wet scrubber shall be in operation at all times when the shot blasters are in operation.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

In order to avoid PSD requirement, the PM emissions from the shot blaster shall not exceed 5.5 pounds per hour when operating at a process weight rate of 19 tons per hour. The wet scrubber shall be in operation at all times when the shot blasters are in operation.

- (q) Pneumatic shot blaster, identified as 132544, installed April 1985, PSD 2-2 is applicable, predates PM-10 regulations

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate for the shot blast machine identified as 132544 shall not exceed 29 pounds per hour when operating at a process weight rate of 19 tons per hour. The wet scrubber shall be in operation at all times when the shot blasters are in operation.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

In order to avoid PSD requirement, the PM emissions from the shot blaster shall not exceed 5.5 pounds per hour when operating at a process weight rate of 19 tons per hour. The wet scrubbers shall be in operation at all times when the shot blaster are in operation.

- (r) Two (2) pneumatic shot blasters, identified as 220554, and 220545 installed May 1988, PSD 2-2 is applicable, and PM-10 regulations (PM -10 regulations final July 31 , 1987)

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate for the shot blast machines identified as 220554 and 220545 shall not exceed 29 pounds per hour when operating at a process weight rate of 19 tons per hour. The wet scrubbers shall be in operation at all times when the shot blasters are in operation.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

In order to avoid PSD requirement, the PM emissions from the shot blasters shall not exceed 5.5 pounds per hour when operating at a process weight rate of 19 tons per hour. The wet scrubbers shall be in operation at all times when the shot blasters are in operation.

Furthermore, each shot blaster identified as 220554 and 220545 shall not exceed the PM-10 limit of 3.2 pounds per hour when operating at a process weight rate of 19 tons per hour. In order to avoid PSD requirement, the PM-10 emissions from the shot blaster has been limited to less than 15 tons per year.

- (t) The control equipment shall be operating at all times while the shot blasting machines are in operation.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- 1) The spreader stoker boilers, identified as boilers 1, 2, and 3, have applicable compliance monitoring conditions as specified below:

Particulate

The control device shall be in operation at all times when the boilers are in operation and exhausting to the outside atmosphere.

Visible Emissions Notations

- (a) Daily visible emission notations of the boiler's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- 2) The boiler, identified as boiler 4 has applicable compliance monitoring conditions as specified below:

Visible Emissions Notations

- (a) Daily visible emission notations of the boiler's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Fuel usage

When this boiler is using natural gas as fuel, there are no applicable compliance monitoring requirements.

- 3) The shot blaster AC-NK8991 has applicable compliance monitoring conditions as specified below:

Scrubber Operating Condition

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. The Preventive Maintenance Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.

- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (d) In the event that a scrubber's failure has been observed:
 - (i) The affected process will be shut down immediately until the failed unit has been replaced or repaired.

Visible Emissions Notations

- (a) Daily visible emission notations of the associated control device's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- 4) The shot blaster NK5448 has applicable compliance monitoring conditions as specified below:

Scrubber Operating Condition

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. The Preventive Maintenance Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.
- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.

- (d) In the event that a scrubber's failure has been observed:

The affected process will be shut down immediately until the failed unit has been replaced or repaired.

Visible Emissions Notations

- (a) Daily visible emission notations of the associated control device's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- 5) The pneumatic shot blasting units identified as 180732, 132841, 180532, and 180548 segment ID2 have applicable compliance monitoring conditions as specified below:

Scrubber Operating Condition

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. The Preventive Maintenance Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.
- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (d) In the event that a scrubber's failure has been observed:

The affected process will be shut down immediately until the failed unit has been replaced or repaired.

Visible Emissions Notations

- (a) Daily visible emission notations of the associated control device's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- 6) The shot blasters 199672, 132544, 220554, 220545 and 324739 have applicable compliance monitoring conditions as specified below:

Visible Emissions Notations

- (a) Daily visible emission notations of the associated control device's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Scrubber Operating Condition

That the scrubber shall be operated at all times when the pneumatic shot blasting machines are in operation.

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop and flow rate of the scrubber shall be maintained at a range of 8 to 12 inches of water and 730 gallons per minute, respectively. The Preventive Maintenance Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.
- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

(c) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.

(d) In the event that a scrubber's failure has been observed:

The affected process will be shut down immediately until the failed unit has been replaced or repaired.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

Conclusion

The operation of machining, cleaning, heat treating and marking facilities to produce transmissions for use in automobiles and light duty trucks shall be subject to the conditions of the attached proposed **Part 70 Permit No. T067-6504-00005**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: DaimlerChrysler - Kokomo Transmission Plant (KTP)
 Source Location: 2401 South Reed Road
 County: Howard
 SIC Code: 3714
 Operation Permit No.: T067-6504-00065
 Permit Reviewer: Peggy Zukas

On October 29, 1998, the Office of Air Management (OAM) had a notice published in the Kokomo Tribune in Kokomo, Indiana, stating that DaimlerChrysler - KTP had applied for a Part 70 Operating Permit to operate a machining, cleaning, and heat treating to produce transmissions for use in automobiles and light duty trucks. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

Comment 1:

DaimlerChrysler Corporation requests that all references to Chrysler Corporation be changed to DaimlerChrysler Corporation.

Response to comment 1:

OAM will make the appropriate changes.

Comment 2:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

"The Permittee owns and operates machining, cleaning, heat treating and marking furnaces to produce transmissions for use in automobiles and light duty trucks. The Chrysler Corporation Kokomo Transmission Plant has been combined with the Chrysler Corporation Kokomo Casting Plant as one Title V source. The combined source ID for the source is 067-00005."

Comment 1 - KTP does not operate any marking furnaces, therefore, marking furnaces should be removed from Section A.1.

Comment 2- KTP request that IDEM verify the combined Title V source ID. In a recent telephone conversation with IDEM the combined Title V source ID was relayed as 067-00065.

Comment - 3 This section of the Draft Part 70 Operating permit includes a reference to the Daimler Chrysler Kokomo Transmission Plant and the DaimlerChrysler Kokomo Casting Plant as having " been combined... as one Title V source." This statement is not factually or legally accurate and the language should be revised and supplemented.

The Kokomo Transmission Plant and the Kokomo Casting Plant are considered by IDEM to be a single "major source" as that term currently is defined by Indiana regulations at 326 IAC 2-7-1(22). In fact, these two facilities are completely different types of manufacturing operations and are subject to independent management personnel and structure.

DaimlerChrysler reserves its right to demonstrate that the two facilities are individual and independent manufacturing operations, should there be a change to the regulatory definition of "major source" for purposes of the Part 70 Operating Permit program. In addition, DaimlerChrysler reserves its right to demonstrate that these two facilities are individual, discrete and independent emissions sources under other state and federal air quality and/or permitting programs. It is important to recognize that a physical or operational change at the Kokomo Transmission Plant is not necessarily related to or a component of a physical or operational change at the Kokomo Casting Plant.

DaimlerChrysler suggests the following revisions to Permit Condition A.1:

"The Permittee owns and operates machinery, cleaning and heat treating to produce transmissions for use in automobiles and light-duty trucks. For purposes of the Part 70 Operating Permit program, the DaimlerChrysler Kokomo Transmission Plant and the DaimlerChrysler Kokomo Casting Plant are being considered a single "major source," as that term is currently defined at 326 IAC 2-7-1(22) and is given single source ID 067-00065. Because operation of the two facilities is by independent and unrelated management personnel and structure, IDEM is issuing two separate Part 70 Operating Permits to these two facilities."

Responses to comment 2:

Comment - 1 of 3

OAM will make the following changes to section A.1:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

"The Permittee owns and operates machining, cleaning, **and** heat treating **facilities** ~~and marking furnaces~~ to produce transmissions for use in automobiles and light duty trucks. The **DaimlerChrysler** Corporation Kokomo Transmission Plant has been combined with the **DaimlerChrysler** Corporation Kokomo Casting Plant as one Title V source. The combined source ID for the source is 067-000**65**."

Comment - 2 of 3

The correct Plant ID number is 067-00065. The current source ID of 067-00005 will be changed to 067-00065.

Comment - 3 of 3

Section A.1 will be revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

"The Permittee owns and operates machining, cleaning, **and** heat treating ~~and marking furnaces~~ to produce transmissions for use in automobiles and light duty trucks. The **DaimlerChrysler** Corporation Kokomo Transmission Plant ~~has been combined with the~~ **and DaimlerChrysler** Corporation Kokomo Casting Plant **have been considered a single** Title V **major** source. The combined source ID for the source is 067-000**65**."

Comment 3:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

KTP requests that IDEM verify the combined Title V source ID. In a recent telephone conversation with IDEM, the combined Title V source ID was relayed as 067-00065.

Response to comment 3:

The correct Plant ID number is 067-00065. The OAM has corrected the permit.

Comment 4:

Section A.2.4

“One (1) boiler, identified as boiler 4, segment ID 1, fueled by reclaimed residual oil, and segment ID 2, fueled by natural gas, maximum heat capacity is 90 MMBtu per hour, and exhausting to stack boiler.”

The words “the common” should be inserted prior to the word “stack.” Boilers 1 through 5 exhaust through the same stack.

Response to comment 4:

The description shall be amended as follows in section A.2.4 and Section D.2:

One (1) boiler, identified as boiler 4, segment ID 1, fueled by reclaimed residual oil, and segment ID 2, fueled by natural gas, maximum heat capacity is 90 MMBtu per hour, and exhausting to **the common** stack boiler.

Comment 5:

Section A.2.7

“Cutting oil used in machining, identified as MACH, segment ID 2.”

This manufacturing process material should be deleted from the list because it is not an “emission unit” as that term is defined in 326 IAC 2-7-1 (15). Furthermore, the list of “insignificant activities” included at Permit Section A.3 specifically identifies the machining operations which utilize cutting oils, and accurately describes the pollution control equipment associated with this activity.

The listing (Section A.2.7) for “cutting oil” should be deleted to avoid confusion and to conform to the applicable regulations. Failure to delete this item from the list of “emissions units” is likely to cause uncertainty about the Permittee’s obligation. Because machinery operations utilizing cutting oils are “insignificant activities,” those emissions need not be included in the annual emissions statement [per 326 IAC 2-7-1(J)]. If there is a change involving “cutting oil,” it is not a change to an “emission unit” and shall not constitute a modification for purposes of Section 12 of the Part 70 Operating Permit regulations [per 326 IAC 2-7-1(K)]

Response to comment 5:

The following description shall be removed from the permit in Section A.2 (7) and the TSD:

~~7. Cutting oil used in machining, identified as MACH, segment ID 2.~~

The numbering of the facilities have been modified to reflect this change.

Comment 6:

Section A.2.14

“Six (6) reciprocating internal combustion engines, identified as dyna, segment ID 1, fueled by gasoline, combined heat capacity is 16.8 MMBtu per hour and exhausting to stacks.”

The words “Six (6)” should be replace with “Four (4).” KTP currently operates four dynamometer test cells, each with one internal combustion engine. There are two additional dynamometers which accommodate vehicles. The vehicles are considered mobile sources and are therefore not regulated under a Part 70 Operating Permit.

Response to comment 6:

Section A.2.14 (now A.13) and the TSD shall be revised as follows:

~~Six (6)~~ **Four (4)** reciprocating internal combustion engines, identified as dyna, segment ID 1, fueled by gasoline, combined heat capacity is 16.8 MMBtu per hour and exhausting to stacks.

Comment 7:

Section A.2.16

“Metal cleaner - Petroleum type, identified as MC, segment ID 1.”

For the same reasons set forth in Section A.2.7 this entry for “metal cleaner” should be deleted from this list. This material is used in the manufacturing operations and does not meet the regulatory definition of “emission unit.” Failure to delete it as a listed “emissions unit” is likely to create uncertainty in the Permittee’s regulatory obligations. Because it is not an “emission unit,” DaimlerChrysler has no obligation under 326 IAC 2-7-1(J) to include emissions in its annual statement or under 326 IAC 2-7-1(K) to consider a change involving “metal cleaner” a “modification” for purposes of Section 12.

Response to comment 7:

The following description shall be removed from the permit in Section A.2 (16) and the TSD:

~~15. Metal cleaner - Petroleum type, identified as MC, segment ID 1.~~

The numbering of the facilities have been modified to reflect this change.

Comment 8:

“Covered conveyors for coal or coke conveying of less than or equal to 360 tons per day.”

The word “of”, which follows the words “coke conveying,” should be removed.

Response to comment 8:

Section A.3.19 shall be revised as follows:

“Covered conveyors for coal or coke conveying of less than or equal to 360 tons per day.”

Comment 9:

Section A.3.45

“Approximately 900 individual machining operations, identified as MACH, segment ID 1, consisting of an oil mist from cutting oil, synthetic grinding coolant, and drilling oil, using air washers (scrubbers), and dust collectors as control.”

The words “approximately 900” should be replaced with the word “Multiple.” The quantity of individual machining operations at the plant may increase or decrease and does not affect the determination that they are insignificant. Also, many of the individual machining operations would be considered insignificant under Section A.3.30, which considers certain grinding and machining operations to be insignificant.

Response to comment 9:

OAM will make the following revisions to section A.3.45:

“~~Approximately 900~~ **Multiple** individual machining operations, identified as MACH, segment ID 1, consisting of an oil mist from cutting oil, synthetic grinding coolant, and drilling oil, using air washers (scrubbers), and dust collectors as control.”

Comment 10:

Section A.3.46

“Forty (40) heaters, segment ID1, fueled by natural gas, combined maximum heat capacity is 77.76 MMBtu per hour.”

Each of the heaters is less than 10 MMBtu per hour and is covered by Section A.3.1 which states “Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour.” KTP therefore requests that Section A.3.46 be removed.

Response to comment 10:

Since no specific condition is applicable to the forty (40) heaters, the description will be deleted. The following has been revised as follows:

1. Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour.

~~Forty (40) heaters, segment ID 1, fueled by natural gas, combined maximum heat capacity is 77.76 MMBtu per hour.~~

Comment 11:

Section A.4 - Part 70 Permit Applicability [326 IAC 2-7-2]

"This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22):
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

KTP requests that Section A.4 (a) be revised to read as follows: "(a) It is a major source, as defined in 326 IAC 2-7-1(22) (A) and 326 IAC 2-7-1(22)(C)." Also, please refer to Section A.1.

Response to comment 11:

The OAM has cited the rule 326 IAC 2-7-1(22) instead 326 IAC 2-7-1(22)(A) and 326 IAC 2-7-1(22)(C) because it is not necessary to distinguish (A), (B) and (C) since they are mentioned in paragraph (22). The condition shall remain the same.

Comment 12:

Section B.8(c)

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

The Draft Permit should be revised to state, Upon receipt of a written request, the Permittee shall also furnish..." in this provision which imposes an obligation to produce required records. This revision will make subparagraph 8(c) consistent with 8(b), and resolve any future questions about DaimlerChrysler's obligation to produce records since there will be a written record of the request from IDEM.

Response to comment 12:

Section B.8(c) shall be changes as follows:

- (c) Upon **receipt of a written** request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

Comment 13:

B.9 (a)

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application."

The Indiana regulations for Part 70 Operating Permits require IDEM to specify which permit terms or conditions are state enforceable and which permit terms are federally enforceable, as set forth at 325 IAC 2-7-5(1)(G). DaimlerChrysler respectfully requests that IDEM identify in the final Operating Permit which permit terms, conditions and/or limitations are federally enforceable.

Only those permit terms or conditions that are specifically designated at being "federally enforceable" will subject the Permittee to potential liability under the federal Clean Air Act. The permit provision should be revised to state, *"Noncompliance with any provisions of this permit which have been designated as 'federally enforceable' pursuant to 325 IAC 2-7-5 (1) (G) constitute a violation of the Clean Air Act..."*

Response to comment 13:

The OAM has identified the permit requirements that are not federally enforceable. Any permit requirements not specifically identified as "not federally enforceable" shall be considered federally enforceable. For example, OAM has identified C.4 as not being federally enforceable. Thus, OAM has met the requirements set forth in 326 IAC 2-7-5(1)(G). Below is an example of a condition that is not federally enforceable:

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are **not federally enforceable**.

326 IAC 2-7-5(6)(A) requires that the permit contain a provision stating the permittee must comply with all conditions of the Part 70 permit. Any Part 70 permit noncompliance constitutes a violation of the CAA and is grounds for enforcement and other actions. No change was made as a result of this comment.

Comment 14:

Section B.11 (c) (6)

“Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.”

This provision of the draft permit specifies the required components of the annual compliance certification that DaimlerChrysler must submit to IDEM. Although the language of this provision tracks closely the language of the applicable regulation [326 IAC 2-7-6(5)], the inclusion of subparagraph B.11 (c)(6) and the reference to “such other facts...as IDEM, OAM may require” creates tremendous uncertainty in what DaimlerChrysler must include in its compliance certification.

We have reviewed Section “D” of the draft permit and find no “such other facts” specified that would be required to determine the compliance status of the source. If there are additional facts that must be included in the annual compliance certification, those facts should be identified precisely; DaimlerChrysler should not be put at risk of violating the compliance certification requirements by having to guess what needs to be included in its submittal. For that reason, IDEM should specify the information that must be included, or if there is none, delete Permit condition B.11(c)(6) entirely.

IDEM and DaimlerChrysler need to agree on what steps DaimlerChrysler must take and what data it must review to satisfy the requirement for conducting a “reasonable inquiry” into the facility’s compliance status. If the comprehensive recordkeeping and monitoring required under the permit is done, and no other evidence of non-compliance is known, then DaimlerChrysler should be able to certify compliance based on the results of the language in this Permit Section so the DaimlerChrysler would not be forced to wonder whether it should have done something more to support the certification, such as conducting stack testing, internal audits, employee interviews, etc. Of course, should the IDEM discover any credible evidence of non-compliance, it is not barred from pursuing an enforcement action.

In connection with the development of the “ACE” rule, the EPA received comments arguing that the rule created uncertainties and burdens... because sources will not know what information they must consider before certifying compliance with Title V permit requirements.” Rejecting the comment, EPA countered that the “ACE” rule merely eliminates... any potential ambiguity regarding the use of non-reference test data as a basis for Title V compliance certifications.” Moreover, EPA did not prohibit the permitting authority from identifying the data to be used as the basis for certifying compliance, as long as the Title V Operating Permit does not prohibit the use of other data to prove non-compliance nor allow the source to ignore relevant data that may indicate non-compliance EPA explained:

Of course, if a source becomes aware of other material information that indicates that an emission unit has experienced deviations (as that term is defined in the draft CAM approach) or may otherwise be out of compliance with an applicable requirement even though the unit’s permit-identified data indicates compliance, the source must consider this information, identify and address it in the compliance certification and certify accordingly...EPA does not view compliance certification requirements as imposing a duty on the source to search out and review every possible document to determine its relevance on the issue of the source’s compliance. (Final “ACE” Rule, February 24, 1997, at p.8320.)

DaimlerChrysler is not asking IDEM to include “any credible evidence buster” language that EPA would object to. We fully understand EPA’s position that any credible evidence may be used to prove the existence of a violation.

If added to the Part 70 Operating Permit for the Kokomo Transmissions Plant, the following language would eliminate any doubt about the authority of IDEM or EPA to use any credible evidence to prove non-compliance while indicating what data and information IDEM and DaimlerChrysler have agreed upon as sufficient to prepare the annual compliance certification:

B.11(d) "Unless the Permittee is aware of other relevant and material information indicating non-compliance, the recordkeeping required by this Permit provides an adequate method and sufficient information to allow the permittee to determine and certify compliance with the terms and condition of this Permit.

Response to comment 14:

DaimlerChrysler is correct that the rule does not address what method OAM would use to determine compliance status. IDEM will not hold DaimlerChrysler responsible for "such other facts" unless IDEM had provided some form of notification of a requirement to the company. This may be included in the permit, a nonrule policy, an agreed order, a letter to the company or any other means of notification to the company.

Comment 15:

Section B.14(b)

"(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the sections of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit; or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable."

This provision of the Draft Permit provides the "permit shield" required by 326 IAC 2-7-15 to be included in a Part 70 Operating Permit. to provide a "permit Shield" with the broadest coverage allowed by the applicable state and federal regulations, those potentially applicable requirements that have been determined by IDEM as not being applicable to the permitted facility must be included in the permit document. According to state regulation, the Operating Permit must "... include(s) the determination or a concise summary thereof that other requirements specifically identified are not applicable to the source."

Therefore, KTP requests that the Federal Rule Applicability determination included on page 8 of the Technical Support Document be included in KTP's Part 70 permit. The Federal Rule Applicability determination reads as follows:

- (a) There are no New Source Performance Standards (326 IAC 112) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.
- (c) 40 CFR 63 Subpart T (National Emission Standards for Halogenated Solvent Cleaning) The solvent basins, ID CC, segment ID 1, are exempt from this rule since the solvent does not contain any of the cleaning solvent mentioned in the rule.

- (d) 40 CFR Part 60.40c Subpart Dc Boilers 1, 2, and 3 are exempt from Subpart Dc since the boilers were constructed in 1955 which predates the Subpart Dc applicability date of June 9, 1989.
- (e) 40 CFR Part 60.40c Subpart Dc Boiler 4 is exempt from Subpart Dc since the boiler was constructed in 1964 which predates the Subpart Dc applicability date of June 9, 1989.
- (f) 40 CFR Part 60.40c Subpart Dc Boiler 5 is exempt from Subpart Dc since the boiler was constructed in 1965 which predates the Subpart Dc applicability date of June 9, 1989.

Response to comment 15:

The following nonapplicable rules will be included in the Title V permit Sections 1, 2, 3, 4, 5, 6, 7, and 8 as requested by DaimlerChrysler.

D.1.4 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to this boiler in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) Boiler 1, Boiler 2, and Boiler 3 are exempt from 40 CFR Part 60.40c Subpart Dc since the boilers were constructed in 1955 which predates Subpart Dc applicability date of June 9, 1989.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

D.2.3 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to this boiler in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) Boiler 4 is exempt from 40 CFR Part 60.40c Subpart Dc since the boiler was constructed in 1964 which predates the Subpart Dc applicability date of June 9, 1989.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

D.3.2 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to this boiler in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) Boiler 5 is exempt from 40 CFR Part 60.40c Subpart Dc since the boiler was constructed in 1965 which predates the Subpart Dc applicability date of June 9, 1989.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

D.4.2 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to this shot blaster in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

There are no New Source Performance Standards (326 IAC 12) applicable to this source.

D.5.3 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to this shot blaster in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

There are no New Source Performance Standards (326 IAC 12) applicable to this source.

D.6.4 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to these shot blasters in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

There are no New Source Performance Standards (326 IAC 12) applicable to this source.

D.7.4 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to these shot blasters in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

There are no New Source Performance Standards (326 IAC 12) applicable to this source.

D.8.2 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to these cold cleaners in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) The solvent basins, ID CC, segment ID 1, are exempt from 40 CFR 63 Subpart T since the solvent does not contain any of the cleaning solvents mentioned in the rule.**
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.**
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.**

Comment 16:

Section B.16

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:**

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

The Draft Permit defines the term "deviation" very broadly to be a violation of the permit requirements, unless the deviation meets one of four very narrow exceptions. Defining deviations broadly appears to be consistent with the state regulations and with the federal part 70 regulations [particularly 40 CFR 71.6(a)(3)]. Consequently, DaimlerChrysler does not challenge the manner in which IDEM has defined "deviations" or the corresponding obligation to report all deviations that occur. However, DaimlerChrysler requests that IDEM acknowledge that the occurrence of a "deviation" reportable under the permit does not, in itself, constitute a violation of the permit.

Permit language which clarifies that the occurrence of a deviation does not necessarily constitute a violation of the permit is proper under the applicable state regulations and under recent federal guidance. In proposing its Enhanced Monitoring Program under the Title V Operating Permit Program, the USEPA was very clear about the legal effect of reporting a deviation. In the October 22, 1993, propose rulemaking, USEPA explained:

"Under the proposal, deviations are not necessarily violations and would be reported whether they are in fact violations of the standards. For example, even if deviations are exempt under existing regulations, these deviations would be reported, with an indication that the owner or operator believes the deviations to be from known causes but exempt under applicable requirements." (See October 22, 1993, Federal Register at p. 54673)."

EPA's position on "deviations" is to define the term very broadly (as IDEM has done in the Draft Permit), and to require reporting of all of those deviations, from which the Agency will determine whether a violation of the permit has occurred. This is also consistent with USEPA's longstanding policy of the reporting of exceedances under the NSPS program (40 CFR 60.7). In the final Compliance Assurance Monitoring ("CAM") rule, USEPA formally adopted this approach, "Thus, although staying within appropriately established indicator ranges gives a reasonable assurance of compliance, excursions from indicator ranges do not necessarily indicate non-compliance." (See October 22, 1997, Federal Register at p. 54907.)

For the reasons set forth above, DaimlerChrysler respectfully requests that IDEM include the following language in a new subparagraph (e).

Deviations reported under this provision do not constitute violations of this permit or the underlying applicable requirements unless all prerequisites to identification of a violation are satisfied.

Response to comment 16:

The OAM has decided to not to revise condition B.16 for the following reasons:

First, there is nothing in this condition, model condition B.16, that says that every deviation is a violation. The suggested language is also vague as to who identifies all the prerequisites of a violation and what the prerequisites are. Third, and most significantly, there are several other conditions in the model permit where OAM does state when a violation will occur. It would be contradictory to state that the same deviations that must be reported in B.16 may not be violations and then say in other conditions that some of these same deviations are violations, or that they are potential violations. The other conditions that mention violations are:

B.12 (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a **violation** of any limitation on emissions or potential to emit.

B.13(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a **violation** of 326 IAC 2-7 and any other applicable rules.

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single **potential violation** of this permit.

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6][326 IAC 1-6]

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a **violation** of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

Comment 17:

Section B.26

“(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee."

This condition of the Draft Permit is based on the state regulations set forth at 326 IAC 2-7-19 and 2-7-5(7). The latter regulation requires that the permit include a provision for payment of fees, "... consistent with the fee schedule approved under Section 19 of this rule; and consistent with the other provisions of Section 19. There are several exceptions in Section 19 however, that are not included in the Draft Permit. For example, the 30-day deadline for payment does not apply if the annual fee is paid under an approved fee schedule and there are provisions for submitting partial payment if the fee amount is disputed. This permit condition should be revised to accurately incorporate all of the requirements and exceptions provided in 326 IAC 2-7-19.

Response to comment 17:

The OAM has provided the rule cite in order for a company to review the fee regulation. It will be the responsibility of a company to review the regulation since OAM will not include the rule in its entirety.

Comment 18:

C.10 Performance Testing [326 IAC 3-6]

See the draft Part 70 Permit for the text of this condition.

This provision of the Draft Permit establishes specific deadlines for submittal of test protocols, notices of emissions testing and submittal for test reports. This provision should be revised to clarify that DaimlerChrysler is not required to proceed with the emissions testing until after it receives IDEM's written approval of the test protocol.

Response to comment 18:

According to 326 IAC 3-6-2 (Source sampling protocols), the OAM compliance section is required to notify the source operator, and the testing firm by letter or telephone not later than twenty-one (21) days prior to test date that the test protocol form was inadequate. The compliance section is not required by 326 IAC 3-6-2 to notify a company when a test protocol is accepted. If DaimlerChrysler would like verification that the test protocol is accepted by compliance, then DaimlerChrysler could contact the compliance section and ask about the status of the test protocol. The condition shall remain the same.

Comment 19:

Section C.18(a)(5)

- "(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted."

This provision is somewhat confusing in establishing that obligation and deadline for development of a Compliance Monitoring Plan ("CMP"). On the one hand, the Draft permit requires DaimlerChrysler to prepare a CMP upon IDEM request; on the other hand, the permit requires preparation of a CMP within 90 days of issuance of the final Operating Permit. This obligation needs to be clarified.

Response to comment 19:

Compliance Response Plan (CRP) shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site. The OAM may request to review and approve the CRP after the CRP has been prepared by the designated time allowed.

Comment 20:

Section C.19(b)

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

This permit provision addresses stack testing results and the obligations imposed on the Permittee in the event the test results indicated potential noncompliance with emission limitations specified by the permit. Through this permit condition, IDEM reserves its authority to take enforcement action if the stack test results provide evidence of a violation, and that is certainly within the agency's legal authority. The permit condition goes much further however, in subparagraph (b) where IDEM asserts that subsequent test results may be grounds "...for immediate revocation of the permit to operate the affected facility."

DaimlerChrysler questions IDEM's legal authority to effectuate "immediate revocation" of the Permit as stated in this permit provision. The applicable regulation set forth at 326 IAC 2-7-9 specifies procedural steps that IDEM must take to reopen and revise or revoke an issued Part 70 Operating Permit. DaimlerChrysler requests a revision to this permit condition to delete references to "immediate revocation" and if necessary, a reference to the applicable regulation at 326 IAC 2-7-9. DaimlerChrysler cannot agree to waive the procedural protections afforded by the applicable regulations for permit revocation, particularly since there can be numerous cause for inaccurate or unreliable emissions testing results which are unrelated to actual compliance with emission limitations.

Response to comment 20:

Section C.19(b) has been modified by deleting the word immediate.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for ~~immediate~~ revocation of the permit to operate the affected facility.

Comment 21:

Section C.20 (d)

- C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
“(d) The DaimlerChrysler Corporation Kokomo Transmission Plant and the DaimlerChrysler Corporation Kokomo Casting Plant have been determined to be one source for Title V, separate Title V permits have been issued for administrative purposes. DaimlerChrysler Corporation Kokomo Casting Plant was issued Title V permit, 067-5246-00002. The emissions information for each plant shall be combined into a single emission statement for the entire source under source ID 067-00065.”

KTP requests that Section C.20(d) be revised to allow KTP and Kokomo Casting to continue filing separate emission statements under their existing, individual source IDs, 067-00003 and 067-00002. This is consistent with conversations between IDEM's Ken Ritter and KTP subsequent to the original draft ROP during which it was agreed since separate ROP's would be issued for each facility, separate emission statements would be acceptable as well.

KTP requests clarification on the determination of a “responsible official” for all of the submittals specified by the Part 70 Permit which require the certification of a “responsible official” (i.e. since separate Part 70 Permits are proposed to be issued for KTP and Kokomo Casting, is each plant manager considered a “responsible official” for their respective plant)?

Response to comment 21:

- (d) The DaimlerChrysler Corporation Kokomo Transmission Plant and the DaimlerChrysler Corporation Kokomo Casting Plant have been determined to be one Title V major source, separate Title V permits have been issued for administrative purposes. DaimlerChrysler Corporation Kokomo Casting Plant was issued a Title V permit, 067-5246-00002. ~~The emissions information for each plant shall be combined into a single emission statement for the entire source under source ID 067-00065.~~ **The emissions information for each plant shall be submitted on separate emissions statements. The emission statement submitted by DaimlerChrysler Corporation Kokomo Transmission Plant shall include the original plant ID of 067-00002 and the combined source plant ID of 067-00065.**

Please review rule 326 IAC 2-7-1(34) for the definition of responsible official.

Comment 22:

Section C.21

- C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
DaimlerChrysler assumes that IDEM expects use of the “Quarterly Compliance Monitoring Report” form that is included at page 55 of 55. Confirmation of DaimlerChrysler's assumption is requested, as well as a revision to this permit condition to specify use of the form.

Response to comment 22:

The DaimlerChrysler is not required to use the Quarterly Compliance Monitoring Report form prepared by OAM. The DaimlerChrysler may use the quarterly report form provided by OAM or create its own quarterly report form, providing all information requested by the OAM is included in the DaimlerChrysler form. Thus, the condition shall remain the same.

Comment 23:

Section C.21(c)

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

This permit provision requires “additional observations and sampling” if the permitted equipment is operating but “abnormal condition prevail.” DaimlerChrysler requests that IDEM specify what is intended to constitute the “additional” observations and sampling required during abnormal operation. Since a failure to comply with the permit terms can expose DaimlerChrysler to enforcement liability, the scope and nature of this permit requirement must be specified or deleted.

Response to comment 23:

Because of the variability of abnormal conditions, OAM can not be specific what additional observations and sampling may be taken. The DaimlerChrysler company may discuss this condition with the OAM inspector.

Comment 24:

Section C.23

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- “(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.”

“The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).”

KTP requests that Section C.23 be revised to indicate that the “Part 70 OPERATING PERMIT - QUARTERLY COMPLIANCE MONITORING REPORT”, included on Page 55 of the Part 70 Permit, or its equivalent be utilized to fulfill the requirement of C.23 (a).

KTP requests that the statement “Attach a signed certification to complete this report.” be removed from “Part 70 OPERATING PERMIT - QUARTERLY COMPLIANCE MONITORING REPORT, included on page 55 of the Part 70 Permit as section C.23 specifically states that certification by a responsible official is not required.

Response to Comment 24:

The OAM has made the following changes:

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- “(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a **Part 70 OPERATING PERMIT - QUARTERLY COMPLIANCE MONITORING REPORT**. Any deviation from the requirements and the date(s) of each deviation must be reported.”

The DaimlerChrysler is correct that a responsible official is not required to certify the quarterly report form. However, the quarterly report form must be attached to a signed certification form to complete the report. Please refer the permit page 49 of 55 (now 54 of 60) to review the certification form.

Comment 25:

Section D.1

All of the permit terms and conditions in Section D.1 apply to the three boilers which are accurately described in the Facility Description "box" on page 33 of 55. Once the emission units are described and identified as "Boiler 1," "Boiler 2" and "Boiler 3", those name designations should be used throughout Section D.1.

In this section of the Draft Part 70 Operating Permit, IDEM has used various descriptions/designations for Boilers 1, 2, and 3 including "boilers number 1, 2, 3, 4 and 5," "each MM47 Btu per hour coal-fired boilers," "this facility," the designation "Boilers 1, 2, and 3" the "boilers" and the "boilers's." For consistency and clarity, the final Part 70 Operating Permit should use one designation for these emissions units, preferably, "Boiler 1, " "Boiler 2," "Boiler 3, " and collectively "Boilers 1, 2, and 3."

Response to comment 25:

The OAM will make the following changes to Section D.1:

D.1.1 326 IAC 6-1-15 Nonattainment area particulate limitations: Howard County

Pursuant to 326 IAC 6-1-15 (Howard County) particulate emissions shall be limited to 875.7 tons per year and 0.75 pounds per million Btu for ~~boiler number 1, 2, 3, 4 and 5.~~ **Boiler 1, Boiler 2, Boiler 3, Boiler 4 and Boiler 5.**

D.1.4 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to this boiler in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) **Boiler 1, Boiler 2, and Boiler 3** ~~Boilers 1, 2, and 3~~ are exempt from 40 CFR Part 60.40c Subpart Dc since the boilers were constructed in 1955 which predates Subpart Dc applicability date of June 9, 1989.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 6 and 12 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for **Boiler 1, Boiler 2, and Boiler 3** ~~boilers 1, 2 and 3.~~

Comment 26:

All of the permit terms and conditions in Section D.2 apply to the boiler which is accurately described and characterized in the Facility Description "Box" on page 36 of 55. Once the emission unit is described and identified as "Boiler 4," that name designation should be used throughout Section D.2. In this section of the Draft Part 70 Operating Permit, IDEM has used various descriptions/designations for boiler 4, including "the 90 MMBtu per hour oil fueled boiler," "ninety (90) MMBtu per hour heater," the "boiler" and "the boiler Four (4)." For consistence and clarity the final Part 70 Operating Permit should use one designation for the emission unit, preferably "Boiler 4."

Response to comment 26:

The OAM will make the following changes to Section D.2:

D.2.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-1-15]

Pursuant to 326 IAC 6-1-15 the particulate emissions shall be limited to 875.7 tons per year and 0.75 pounds per million Btu for ~~boiler number 4 and boilers 1,2,3 and 5 specified~~ **Boiler 4 and collectively Boiler 1, Boiler 2, Boiler 3, and Boiler 5** specified in section D.1 and D.4.

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from **Boiler 4** ~~the 90 MMBtu per hour oil-fueled boiler~~ shall not exceed 1.6 pounds per MMBtu heat input. Based on a heating value of 140,000 Btu per gallon of oil, the fuel sulfur content of the oil used for fuel shall be limited to 1.5 percent (%).

~~D.2.3~~ (now D.2.4) Sulfur Dioxide Emissions and Sulfur Content for reclaimed residual oil

- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from **Boiler 4** ~~ninety (90) MMBtu per hour heater~~, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

~~D.2.5~~ (now D.2.6) Visible Emissions Notations

- (a) Daily visible emission notations of the ~~boiler's~~ **Boiler 4's** stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

~~D.2.6~~ (now D.2.7) Fuel usage

When **Boiler 4** ~~boiler~~ is using natural gas as fuel, there are no applicable compliance monitoring requirements.

~~D.2.9~~ (now D.2.10) Natural gas Certification

The natural gas ~~boiler~~ **Boiler 4** certification form will document compliance with condition D.2.1 when the Boiler 4 is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.

~~D.2.10~~ (now D.2.11) Used Oil Requirements

The used machining and cutting oil burned in the ~~boiler four (4)~~ **Boiler 4** shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

Comment 27:

DaimlerChrysler respectfully requests that the emission unit addressed in this section be consistently referred to as "Boiler 5." This single designation should be used throughout Permit Section D.3.

Response to comment 27:

The OAM will make the following changes to Section D.3:

D.3.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-1-15]

Pursuant to 326 IAC 6-1-15 the particulate emissions shall be limited to 875.7 tons per year and 0.75 pounds per million Btu for ~~boiler number 5 and 1, 2, 3 and 4~~ **Boiler 5 and collectively Boiler 1, Boiler 2, Boiler 3, and Boiler 4 specified in section D.1, D.2 and D.3.**

D.3.2 Nonapplicable Requirements [326 2-7-15 (a)(2)]

The requirements that are not applicable to ~~this boiler~~ Boiler 5 in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

~~D.3.3~~ (now D.3.4) **Fuel usage**

The ~~boiler~~ Boiler 5 is using natural gas fuel only, thus there are no applicable compliance monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.3.4~~ (now D.3.5) **Natural gas Certification**

The natural gas ~~boiler~~ **Boiler 5** certification form will document compliance with condition D.3.1 when ~~the boiler~~ **Boiler 5** is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.

Comment 28:

Section D.1.4

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~"During the period between 6 and 12 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for Boiler 1, Boiler 2, and Boiler 3."~~

KTP requests Section D.1.4 be revised to require testing within 12 months after issuance instead of between 6 and 12 months.

KTP requests that Section D.1.4 be modified to allow simultaneous testing of boilers 1, 2, 3, 4, and 5. Please recall that all five boilers are directed to a common control device and therefore, exhaust through a common stack.

Response to comment 28:

OAM will revise condition D.1.4:

~~D.1.4~~ (now D.1.5) **Testing Requirements [326 IAC 2-7-6(1),(6)]**

~~During the period between 6 and 12 months after issuance of this permit, the Permittee shall perform PM testing~~ **simultaneously for Boiler 1, Boiler 2, Boiler 3, Boiler 4 and Boiler 5** utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for Boiler 1, Boiler 2, and Boiler 3.

Comment 29:

Section D.1.5 (now Section D.1.6)

D.1.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(A)] [326 IAC 2-7-6]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing one of the following options:

- (a) Coal sampling and analysis shall be performed using one of the following procedures:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:
 - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
 - (B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;
 - 3. Minimum sample size shall be five hundred (500) grams;
 - 4. Samples shall be composited and analyzed at the end of each calendar month;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a);
 - (3) Sample and analyze the coal pursuant to 236 IAC 3-7-3; or
- (b) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

- 1- *The reference to 326 IAC 2-7-5(A) does not appear to be an appropriate citation; KTP requests that IDEM clarify which rule or section is being cited. KTP believes that the applicable citations are 326 IAC 7-1.1-1 and 326 IAC 7-1.1-2.*
- 2- *KTP believes that Section D.1.5 (a)(1) should cite 326 IC 3-3-2(b) as 326 IAC 3-7-2(b)(3) does not appear in 326 IAC 3.*
- 3- *KTP believes that Section D.1.5 (a)(2) should cite 326 IAC 3-3-2(a) as 326 IAC 3-3-2(a) as 326 IAC 3-7-2(a) does not appear in 326 IAC 3.*
- 4- *KTP believes that Section D.1.5 (a) (3) should cite 326 IAC 3-3-3 as 326 IAC 3-7-3 does not appear in 326 IAC 3.*
- 5- *KTP believes that Section D.1.5 (b) should cite 326 IAC 3-1-1 as 326 IAC 3-5-1 does not appear in 326 IAC 3.*

Response to 1, 2, 3, 4, and 5:

Please use the August 1998 rule book for the most current rule cites. All the new rule cites mention above shall remain the same.

comment 6- *KTP requests that Section D.1.5(c) be replaced with the language in 326 IAC 7-2-1(b) which reads as follows:*

"Compliance or noncompliance with the emission limitations contained in 326 IAC 7-1.1 or 326 IAC 7-4 can be determined by a stack test in accordance with 40 CFR 60, Appendix A, Method6, 6A, 6C, or 8."

Response to 6:

The OAM will revise the condition to read as follows:

- (c) ~~Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]~~ **Compliance or noncompliance with the emission limitations contained in 326 IAC 7-1.1 or 326 IAC 7-4 can be determined by a stack test in accordance with 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8.**

comment 7- *In accordance with 326 IAC 3-3-3 (a)(2), KTP requests that additional language be added as Section D.1.5 (d). The following procedures represent the existing methods specified in KTP's current operating permits to document compliance with the sulfur dioxide limitations of 3256 IAC 7:*

- (1) *Analyze the coal to determine the sulfur content;*
- (2) *Coal samples may be collected from the coal pile immediately after each new load of coal is delivered and before any coal is combusted;*
- (3) *Vendor analysis of coal delivered is acceptable in lieu of the above, if accompanied by a certification of the sulfur content and heat content.*

Response to comment 7:

The OAM has permitted sources less than 30 MMBtu per hour to do vendor analysis only. If sources are greater than 30 MMBtu per hour but less than 100 MMBtu per hour the source shall do vendor analysis and Coal Sampling Analysis (CSA) once per day. Any boiler larger than 100 MMBtu per hour shall be regulated by the rule [326 IAC 2-7-5(A)] and [326 IAC 2-7-6].

comment 8-

Note that this comment also applies to Section D.2.3. In DaimlerChrysler's August 9, 1998, comment letter on the Preliminary Draft Part 70 Operating Permit, it objected to the permit statement. "A determination of noncompliance pursuant to either of the methods in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method." The IDEM has chosen to keep the objectionable language in the Draft Part 70 Operating Permit, despite DaimlerChrysler's requests to delete the statement.

DaimlerChrysler reasserts its earlier comment justifying deletion of the objectionable language on the grounds that directly conflicts with the opening sentence in these permit IDEM to specify the methods required to generate credible evidence of compliance and then refuse to consider evidence from one or the other method, if that other method demonstrates compliance.

This permit language also directly conflicts with the USEPA's "credible evidence" rulemaking. When promulgating the final rule, EPA explained that its primary purpose was to clarify the authority to use whatever evidence is credible, reliable and probative to prove or disprove compliance with Clean Air Act requirements. EPA stated:

This regulation also does not designate any particular data as probative of a violation of an emission standard. Rather, this regulation merely removes what some have construed to be a regulatory bar to the admission of the non-reference test data to prove a violation of an emission standard, no matter how credible and probative those data are that a violation has occurred. (36 FR at p. 8315, February 24, 1997.)

IDEM's proposed permit language attempts to limit unfairly DaimlerChrysler's legal right to demonstrate compliance and to defend itself against unreliable evidence of noncompliance. EPA clarified that the opposite is what was intended by the "credible evidence" rule and agency policy:

At the same time, sources will be able to use credible evidence for contesting allegations of noncompliance in enforcement actions.... Under today's rule, both sources and potential enforcers will be put on the same evidentiary footing in an enforcement action.

Chrysler respectfully requests that IDEM delete the last statement in both Permit Sections D.1.5 and D.2.3 that limits the use of any of the specified methods to demonstrate compliance with the permit emission limitations.

Response to comment 8:

In 1987, USEPA objected to Indiana's SO₂ SIP. USEPA's concern was that compliance with an emission limitation over a long period of time (30-day averaging) does not assure that shorter peaks in emissions will not result in a violation of the short term (3 hour and 24 hour) national ambient air quality standards. In order to re-instate the 6.0 lbs/MMBtu emission limitation, USEPA offered 2 options. First was to remove the 30 day averaging compliance method or secondly, to make a violation determined by the stack test compliance method independently enforceable. Indiana opted for the latter and added language stating that a determination of noncompliance by either the 30 day rolling weighted average method or stack test method shall not be refuted by evidence of compliance by the other method. Therefore, this language shall remain in the permit.

Comment 30:

Section D.1.8

“(a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.1.1 and D.1.2.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual coal usage since last compliance determination period;
3. Sulfur content, heat content, and ash content;
4. Sulfur dioxide emission rates.”

KTP suggests that the phrase “shall be taken monthly” be replaced with “ shall be compiled on a calendar month bases”

Response to comment 30:

The OAM will revise condition D.1.8(a) (now D.1.9(a)) to read as follows:

(a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be ~~taken monthly~~ **shall be compiled on a calendar month basis** and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.1.1 and D.1.2.

Comment 31:

“Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed one and five-tenths percent (1.5%):

Analyzing the oil sample to determine the sulfur content via the procedures in ASTM test methods as described in 326 IAC 3-3-4(a).

Daily oil samples shall be collected from each tank unless the tank(s) have not been refilled that day. A composite of the samples shall be analyzed on a weekly basis. If the weekly analysis for oil sulfur content is less than 80% of the 1.5% (1.2%) limit for a 12 month consecutive period then the testing procedures will be changed as follows:

Daily oil samples shall be collected from each tank unless the tank(s) have not been refilled that day. A composite of the samples shall be analyzed on a monthly basis."

KTP requests that D.2.3 (a) be revised to require weekly testing only if the current oil analysis results indicate a sulfur content greater than 1.2%. Also, KTP requests that the requirement to test composite oil samples on a weekly basis for 12 consecutive months, prior to being allowed to test on a monthly basis, be revised to one month. KTP currently is in compliance with the sulfur content limitations for the oil and weekly analyses represent an unnecessary burden and cost to the facility. KTP proposes the following language for Section D.2.3 (a):

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed one and five-tenths percent (1.5%):

Analyzing the oil sample to determine the sulfur content via the procedures in ASTM test methods as described in 326 IAC 3-3-4(a).

Daily oil samples shall be collected from each tank unless the tank(s) have not been refilled that day. A composite of the samples shall be analyzed on a weekly basis. If the weekly analysis for oil sulfur content is less than **or equal to** 80% of the 1.5% (1.2%) limit for a ~~12-month consecutive~~ **one month** period then the testing procedures will be changed as follows:

Daily oil samples shall be collected from each tank unless the tank(s) have not been refilled that day. A composite of the samples shall be analyzed on a monthly basis. **If the monthly analysis exceeds 80% of the 1.5%(i.e.1.2%sulfur by weight) limit, then weekly analysis will again be required until the sulfur content is less than or equal to 80% of the 1.5% (i.e., 1.2% sulfur by weight) limit for a one month period.**

Response to comment 31:

Condition D.2.4

The intent of requiring DaimlerChrysler to analyze the samples on a weekly basis for a 12 month consecutive period is to insure compliance with the 1.2 % sulfur content. The OAM has agreed to change the testing procedures to monthly as long as the oil sulfur content is less than or equal to 1.2 % for a 12 month consecutive period. Since the residual oil sulfur content can vary and OAM does not have sufficient information to demonstrate a years worth of sulfur content assuring that DaimlerChrysler can continuously meet the limit, the testing requirements shall remain the same.

The following condition has been revised as follows:

- a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed one and five-tenths percent (1.5%):

Analyzing the oil sample to determine the sulfur content via the procedures in ASTM test methods as described in 326 IAC 3-3-4(a).

Daily oil samples shall be collected from each tank unless the tank(s) have not been refilled that day. A composite of the samples shall be analyzed on a weekly basis. If the weekly analysis for oil sulfur content is less than **or equal to** 80% of the 1.5% (1.2%) limit for a 12 month consecutive period then the testing procedures will be changed as follows:

Daily oil samples shall be collected from each tank unless the tank(s) have not been refilled that day. A composite of the samples shall be analyzed on a monthly basis. **If the monthly analysis exceeds 80% of the 1.5%(i.e.1.2%sulfur by weight) limit then weekly analysis will again be required until the sulfur content is less than or equal to 80% of the 1.5% (i.e., 1.2% sulfur by weight) limit for a one month period.**

The OAM believes the frequent sampling and analyzing requirements are necessary for an extended period of time to accurately assess the sulfur content of the fuel being combusted. This is due to the variability inherent in the residual oil being used by KTP. Therefore, the requirement will not change.

Comment 32:

Section D.4

It appears that several conditions have been inadvertently removed from this version of the Part 70 Permit. For example the requirement for a preventive maintenance plan and compliance monitoring requirements are missing. KTP requests that the conditions for Section D.4 be the same as for Section D.5 with the exception of Section D.4.1 which is appropriate.

Response to comment 32:

The preventive maintenance plan is not necessary if a facility has control and the allowable emissions do not exceed 10 lbs/hr, according to OAM guidance. Since the shot blaster has an allowable PM emission of 4.5 lbs/hr and is controlled by a wet scrubber this unit is not subject to the preventive maintenance plan.

The following compliance monitoring plan has been included in the Section D.4.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D-4.4 (now D.4.5) Scrubber Operation

-
- (a) **The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.**
 - (b) **The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.**
 - (c) **An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.**
 - (d) **In the event that a scrubber's failure has been observed:**

The affected process will be shut down immediately until the failed unit has been replaced or repaired.

D.4.5 (now D.4.6) Visible Emissions Notations

- (a) Daily visible emission notations of the associated control device's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.**

Comment 33:

Section D.4.1

KTP understands that IDEM has made a determination that 326 IAC 6-1 is the applicable rule and that 326 IAC 6-3 does not apply. KTP requests IDEM furnish the basis for this determination to KTP as expeditiously as possible. This comment also applies to Sections D.5.1, D.6.1 and D.7.1.

Response to comment 33:

DaimlerChrysler Corporation - Kokomo Transmission Plant & Casting Plant is considered to be a single major source located in Howard County. Sources or facilities that are located in the nonattainment counties listed in 326 IAC 6-1-7 and have potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year, shall comply with the limitations of 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified). Pursuant to 326 IAC 6-1-2(a), facilities shall not allow or permit discharge to atmosphere of any gases which contained particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf). Thus, sections D.4, D.5, D.6 and D.7 will be modified to incorporate the rule 326 IAC 6-1-2.

Comment 34:

Section D.6.3

KTP requests Section D.6.3 be revised to require testing within 36 months after issuance instead of between 30 and 36 months.

D.6.3 Testing Requirements [326 IAC 2-7-6(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for any one of the shotblast units identified as 180732, 132641, 180532, or 180548.

Response to comment 34:

The OAM will revised the condition as follows:

~~D.6.3~~ (now D.6.5) Testing Requirements [326 IAC 2-7-6(1)]

During the period ~~between 30 and~~ **within** 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for any one of the shotblast units identified as 180732, 132641, 180532, or 180548.

Comment 35:

Section D.7

One (1) pneumatic shot blasting, identified as 324739, segment ID 2, media used is steel shot, shot circulation rate is 24 tons per hour, using wet scrubber for control. (Installation date has not been determined.)

KTP installed shot blasting unit 324739 in September, 1998 and requests that the facility description be modified to reflect this date.

Response to comment 35:

The OAM will revised the facility description as follows:

One (1) pneumatic shot blasting, identified as 324739, segment ID 2, media used is steel shot, shot circulation rate is 24 tons per hour, using wet scrubber for control. (Installation date ~~has not been determined~~ **is September, 1998**).

Comment 36:

Section D.7.4

KTP requests Section D.6.3 be revised to require testing within 36 months after issuance instead of between 30 and 36 months.

D.7.4 Testing Requirements [326 IAC 2-7-6(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for any one of the shotblast units identified as 220554, and 220544.

Response to comment 36:

The OAM will revised the condition as follows:

D.7.4 (now D.76) Testing Requirements [326 IAC 2-7-6(1)]

During the period ~~between 30 and~~ **within** 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for any one of the shotblast units identified as 220554, and 220544.

The following are response to comments received on February 11, 1999:

Section A - Source Summary

Comment 1:

This section of the Draft Part 70 Operating permit includes a reference to the DaimlerChrysler Kokomo Transmission Plant and the DaimlerChrysler Kokomo Casting Plant as having "been combined . . . as one Title V source." This statement is not factually or legally accurate and the language should be revised and supplemented.

Response to comment 1:

Section A.2

The OAM has made the following revision:

"The Permittee owns and operates machining, cleaning, **and** heat treating **facilities and marking furnaces** to produce transmissions for use in automobiles and light duty trucks. The DaimlerChrysler Corporation Kokomo Transmission Plant **and** ~~has been combined with the~~ DaimlerChrysler Kokomo Casting Plant **have been considered a single Title V major source as a single Title V major source.** The DaimlerChrysler Corporation Kokomo Casting Plant was issued a separate Title V permit under the Part 70 No. T067-5246-00065.

Comment 2:

KTP does not operate any marking furnaces. Therefore, "marking furnaces" should be removed form Section A.2.

Response to comment 2:

The marking furnaces have been deleted. Please refer to response 1.

Section A.2.15

"Maintenance painting, identified as MAINTPT, segment ID 1. (a)"

Comment 1:

Delete "(a)" , which has been inserted since the last draft.

Response to comment 1:

OAM has made the change.

Sections A.2.16, 2.17, 2.18, 2.19 and Section D.9 - Facility Operation Conditions

Comment 1:

The emission unit description should be changed to the format that is consistent with the other descriptions in this section. The emission unit description is much more detailed than necessary for the purpose of Title V. For example, equipment identification numbers, and stack numbers are constantly being changed through equipment replacements, moving equipment, equipment modifications or other actions which do not trigger the need for permit review. Thus references to identification numbers for emissions units, stacks, and control equipment should be deleted. The maximum usage rates should also be removed from these sections the maximum usage rates are not operational limits; the insertion of these values in the description appears to create a limit when there are not applicable regulations that would set operation limits.

Response to comment 1:

The OAM has made the following changes:

16. One (1) Wheelabrator Multi table Shotblast Deburr identified as AAA006276, ~~with a maximum media used is~~ steel shot, recirculation rate is 48,000 pounds per hour ~~and parts throughput of 2315 pounds per hour, particulate matter controlled by a Centrispray wet collector identified as #180785 and exhausting at a stack identified as A,², using a wet scrubber for control.~~
17. One (1) Wheelabrator #22 Super III Tumblast identified as AAA012334, ~~with a maximum media used is~~ steel shot, recirculation rate is 56,760 pounds per hour, ~~and parts throughput of 2315 pounds per hour, particulate matter controlled by a Devansco wet collect identified as #3290553 and exhausting at a stack identified as B using a wet scrubber for control.~~
18. One (1) Engineered Abrasive Shot Blaster identified as AAA018493, ~~with a maximum media used is~~ steel shot, recirculation rate is 80 pounds per hour, ~~and parts throughput of 4000 pounds per hour, particulate matter controlled by a Torit cartridge bag house identified as #BH1 and using a cartridge bag house for control and exhausting inside the plant;~~
19. One (1) Engineered Abrasive Shot Blaster identified as AAA018494, ~~with a maximum media used is~~ steel shot, recirculation rate is 80 pounds per hour, ~~and part throughput of 4000 pounds per hour, particulate matter controlled by a Devansco wet collector identified as 3329053 and exhausting at a stack identified as B using a wet scrubber for control.~~

Facility descriptions are not federally enforceable, and a Facility Description Box is not a permit condition and thus is also not federally enforceable. It is clearly stated in Section A of every permit that these facility descriptions are not federally enforceable. The OAM will revise the facility description box as follows:

Facility Description [326 IAC 2-7-5(15)]: **The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

Section D.9.3 - Testing Requirements [326 IAC 2-1-3]

Comment 1:

Delete "and Aluminum Melting Reverberatory Furnace (No.#4)"; this emissions source is located at the Kokomo Casting Plant, and not at the Kokomo Transmission Plant.

Response to comment 1:

The OAM has made the change.

Section D.9.9 - Record Keeping Requirements

- (d) The Permittee shall certify monthly that only clean scrap has been melted in Furnace No. 4 and maintain records of the amount of scrap melted to demonstrate compliance with Condition D.9.1(b) (2) and D.9.1 (b) (3)
- (e) The Permittee shall certify annually that no outside scrap has been melted at the source to demonstrate compliance with Condition D.9.1(b)(6).

Comment 1:

Delete these condition; they refer to an emissions source that is located at the Kokomo Casting Plant and not at the Transmission Plant.

Response to comment 1:

The OAM will make the change.

The following are response to comments received on March 17, 1999:

Table of Contents

Comment 1:

Page "47" should be changed to page "46".

Response to comment 1:

The OAM has made the change.

Section A - Source Summary

Comment 1:

A recent examination of capital equipment records and of the machine itself indicates that the shot blaster identified as "132841" is actually identified as "132641."

Response to comment 1:

The OAM has made the change.

Comment 2:

A recent examination of capital equipment records and an inspection of the shot blasters indicates that shotblaster #180732 does not use a wet scrubber for control, but instead utilizes a baghouse for control.

A recent examination of capital equipment records and of the machine itself indicates that the shot blaster identified as "220545" is actually identified as "220544".

Response to comment 2:

The OAM has made the change.

A.3 - Specifically Regulated Insignificant Activities

Comment 1:

DaimlerChrysler requests that IDEM remove the reference to the forty heaters, unless there are existing permit requirements or applicable regulations which apply to the group of forty heaters identified in Condition A.3.1. Heater such as those referenced in the permit are routinely replaced as they age and for various other reasons. Including them in the Part 70 Operating Permit appears to required that DaimlerChrysler track the units which comprise the above grouping and modify the Part 70 Operating Permit whenever one of those units is replaced.

Response to comment 1:

The OAM will make the change since no requirements are applicable.

Section B - General Conditions

B.26 - Annual Fee Payment

Comment 1:

In order to clarify this permit condition, DaimlerChrysler would appreciate inserting additional language in order to show the other options available under 326 IAC 2-7-19.

Response to comment 1:

The OAM has made the change as follows:

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year, **unless a different schedule is allowed by 326 IAC 2-7-19.**

Section D.1 Facility Operation Conditions

Section D.1.6 - Sulfur Dioxide Emissions and Sulfur Content

Comment 1:

The outlining and the citation "326 IAC 3-7-3" should be changed as follows:

- (C) Minimum sample size shall be five hundred (500) grams;
- (D) Samples shall be composited and analyzed at the end of each calendar month;
- (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
- (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a)
- (3) Sample and analyze the coal pursuant to 236 IAC 3-7-3; or

Response to comment 1:

The OAM will make the change.

Section D.4 - Facility Operation Conditions:

Comment 1:

IDEM's response to DaimlerChrysler's prior comment regarding this condition is: "since the shot blaster has an allowable PM emission of 4.5 lbs/hr and is controlled by a wet scrubber this unit is not subject to the preventive maintenance plan (Addendum to the Technical Support Document for a Part 70 Operating Permit, page 27). However, the "Preventive Maintenance Plan" is still referenced in the above condition. DaimlerChrysler believes that "Preventive Maintenance Plan" should be replaced by the "Compliance Response Plan", similar to Condition D.4.6(e): "The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed."

Response to comment 1:

The OAM has made the following change:

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. ~~The Preventive Maintenance Plan~~ **Compliance Response Plan** for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.

Section D.6 - Facility Operation Conditions

Comment 1:

A recent examination of capital equipment records and of the machine itself indicates that the shot blaster identified as "132841" is actually identified as "132641."

Comment 2:

A recent examination of capital equipment records and an inspection of the shot blasters indicates that shotblaster #180732 does not use a wet scrubber for control, but instead utilizes a baghouse for control.

Response to comment 1:

OAM has made the change.

Section D.7 - Facility Operation Conditions

Comment 1:

A recent examination of capital equipment records and of the machine itself indicates that the shot blaster identified as "220545" is actually identified as "220544." Therefore "220545" should be changed to 220544" in the Facility Description, and in conditions D.7.1 (c) and (d), and D.7.5.

Response to comment 1:

OAM has made the change.

Section D.9 Facility Operation Conditions

Comment 1:

- (b) To document compliance with Condition D.9.5, the Permittee shall maintain records of the results of the inspections required under Condition D.9.6.
- (c) To document compliance with Condition D.9.7, the Permittee shall maintain records of the results of the inspections required under Condition D.9.7.

DaimlerChrysler believes that the Conditions are incorrectly cited. DaimlerChrysler suggests the following:

- (b) To document compliance with Condition D.9.5, the Permittee shall maintain records of the results of the inspections required under Condition D.9.5.
- (c) To document compliance with Condition D.9.6, the Permittee shall maintain records of the results of the inspections required under Condition D.9.6.

Response to comment 1:

OAM has made the changes.

The OAM has made the following revisions to the permit:

- 1) The OAM has removed the following condition:

B.27 — Enhanced New Source Review [326 IAC 2]

~~The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.~~

- 2) IDEM is removing this provision from the permit. IDEM now believes that it is not necessary to include this condition in the permit. The issues regarding credible evidence can be adequately addressed when a showing of compliance or noncompliance is made. Indiana's air pollution control laws allow the use of any credible evidence in determining compliance or noncompliance. An explicit statement is not required in the permit. Although the permit may set out specific methods to determine compliance, any other method or other credible evidence may be admissible to demonstrate compliance or noncompliance.

~~B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

- 3) The OAM has incorporated in section D.9 the new equipment permitted in ENSR-067-10480-00065, issued on March 8, 1999. The TSD shall include the following permit:

Existing Approvals

The source has been operating under the following approvals:

- (1) **ENSR 067-10480-00065, issued on March 8, 1999,**
 - (2) CP 067-6375-00003, issued on November 12, 1996,
 - (3) CP 067-4933-00003, issued on December 19, 1995,
 - (4) OP 34-10-94-0290, issued on January 2, 1990,
 - (5) OP 34-10-94-0291, issued on January 2, 1990,
 - (6) OP 34-10-94-0292, issued on January 2, 1990,
 - (7) OP 34-10-94-0293, issued on January 2, 1990,
 - (8) OP 34-10-94-0294, issued on January 2, 1990,
 - (9) Registration, number not provided, issued on January 19, 1988,*
 - (10) Amendment to Operation Permit, issued on May 20, 1985,
 - (11) Exemption, number not provided, issued on June 10, 1985,
 - (12) Amendment to Exemption, issued on November 25, 1985,
 - (13) Registration, number not provided, issued on April 16, 1984,
 - (14) Amendment to Operation Permit, issued on May 1, 1984,
 - (15) OP 34-10-86-0257, issued on November 29, 1982,
 - (16) CP (34) 1437, issued on August 20, 1979,
 - (17) CP (34) 1367, issued on March 1, 1979, and
 - (18) OP 34-10-82-0209, issued on October 17, 1978.
16. One (1) Wheelabrator Multi table Shotblast Deburr identified as AAA006276, media used is steel shot, recirculation rate is 48,000 pounds per hour, using a wet scrubber for control.
17. One (1) Wheelabrator #22 Super III Tumblast identified as AAA012334, media used is steel shot, recirculation rate is 56,760 pounds per hour, using a wet scrubber for control.
18. One (1) Engineered Abrasive Shot Blaster identified as AAA018493, media used is steel shot, recirculation rate is 80 pounds per hour, using a cartridge bag house for control and exhausting inside the plant;
19. One (1) Engineered Abrasive Shot Blaster identified as AAA018494, media used is steel shot, recirculation rate is 80 pounds per hour, using a wet scrubber for control.

4) The following condition has changed as follows:

D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition ~~D.4.1~~ **D.4.6**, the Permittee shall maintain records of daily visible emission notations as specified under Condition D.4.6.
- (b) To document compliance with Condition ~~D.4.1~~ **D.4.5**, the Permittee shall maintain records of the wet scrubber operations as specified under Condition D.4.5.

The following are response to comments received on May 27, 1999:

General Comments

Comment 1:

Conditions D.4.1, D.5.1, D.6.1, D.7.1, D.9.1

KTP requests that all references to "Chrysler" be changed to "DaimlerChrysler."

Response to comment 1:

The OAM will make the changes.

Comment 2:

Conditions D.5.6 (a), D.6.6 (a) [now D.6.7 (a)], D.7.7(a) [D.7.8 (a)] and D.9.5 [now D.9.6 (a)]

DaimlerChrysler believes that "Preventive Maintenance Plan" should be replaced by the "Compliance Response Plan," similar to Condition D.4.5 (a).

Response to comment 2:

The OAM will make the change.

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Comment 1:

"D.7 FACILITY OPERATION CONDITIONS - Shot Blasters...46"

Because the pagination of the permit has once again changed page "46" should be changed back to page "47".

Response to comment 1:

The OAM has deleted all page numbering in the table of contents.

Comment 2:

“Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.6 Scrubber Operation

D.6.7 Visible Emissions Notation

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.6.8 Record Keeping Requirements

D.6.9 Reporting Requirements”

The section of the Table of Contents should be changed to:

“Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.7 Scrubber Operation

D.6.8 Visible Emissions Notation

D.6.9 Baghouse Inspections

D.6.10 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.6.11 Record Keeping Requirements

D.6.12 Reporting Requirements”

Response to comment 2:

The OAM will make the changes.

Section D.1 - FACILITY OPERATION CONDITIONS

Section D.1.6 - Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(A)] [326 IAC 2-7-6]

Comment 1:

- “
- (C) Minimum sample size shall be five hundred (500) grams:
 - (B) Samples shall be composited and analyzed at the end of each calendar month.
 - (C) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or”

The outlining in the body of the permit should be changed to reflect the outlining in the Technical Support Document as follows:

- “
- (C) Minimum sample size shall be five hundred (500) grams:
 - (D) Samples shall be composited and analyzed at the end of each calendar month.
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or”

Response to comment 1:

The OAM has made the change.

Comment 2:

“(3) Sample and analyze the coal pursuant to 236 IAC 3-7-3; or”

The citation “236 IAC 3-7-3” should be changed to “326 IAC 3-7-3.”

Response to comment 2:

The OAM has made the change.

SECTION D.2 - FACILITY OPERATION CONDITIONS

D.2.6 - Visible Emissions Notations

Comment 1:

“(a) Daily visible emission notations of the Boiler 4's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere.”

This section should be changed to the following:

“(a) Daily visible emission notations of the boiler's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere.”

Response to comment 1:

The OAM has made the change.

Sections D.4, D.5, D.6, and D.7 - FACILITY OPERATION CONDITIONS - Shot Blast Units

Comment 1:

DaimlerChrysler understands that IDEM-OAM has determined that for particulate matter (PM) the grain loading limitation of 0.03 grains per cubic foot should apply in lieu of the process weight rate limitations. In reviewing the conditions for the shot blast units detailed in Sections D.4 to D.7 DaimlerChrysler has observed that the hourly PM emission limitations for each of the shot blast units has been modified from those established in the respective permits to construct and previous drafts of the Part 70 Operating Permit. In many instances the hourly PM limits were established as part of a PSD applicability determination. Therefore, DaimlerChrysler requests that the original hourly PM limitations be restored (pursuant to 326 IAC 2-2) and that the condition which references PM limitations specifically state the applicability of the 0.03 grains per cubic foot limitation (pursuant to 326 IAC 6-1-2).

Response to comment 1:

OAM has revised the following conditions D.4.1, D.5.1, D.6.1, and D.7.1 and D.9.1:

(1) Condition D.4.1 has been modified as follows:

D.4.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

~~Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), Nonattainment Area Particulate Limitations [326 IAC 6-1-2];~~

~~DaimlerChrysler Corporation – Kokomo Transmission Plant has the following limits:~~

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blaster shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process/Facility	Process Exhaust (scfm)	PM/PM ₁₀ Allowable Emissions (lbs/hr)	Rule Requirement gr/dscf
Shot Blaster AC-NK8991	16,000	4.1	0.03

(2) Condition D.5.1 has been modified as follows:

D.5.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

~~Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), Nonattainment Area Particulate Limitations [326 IAC 6-1-2];~~

~~DaimlerChrysler Corporation – Kokomo Transmission Plant has the following limits:~~

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blaster shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process/Facility	Process Exhaust (scfm)	PM/PM ₁₀ Allowable Emissions (lbs/hr)	Rule Requirement gr/dscf
Shot Blaster NK5448	16,000	0.5 4.1	0.03

(3) Condition D.6.1 has been modified as follows:

D.6.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

~~Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), Nonattainment Area Particulate Limitations [326 IAC 6-1-2];~~

~~DaimlerChrysler Corporation – Kokomo Transmission Plant has the following limits:~~

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blasters shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process/Facility	Process Exhaust (scfm)	PM/PM ₁₀ Allowable Emissions (lbs/hr)	Rule Requirement gr/dscf
Shot Blaster 180732	4,000	1.0	0.03
Shot Blaster 132641	16,000	0.5 4.1	0.03
Shot Blaster 180532		0.5 4.1	0.03
Shot Blaster 180548		0.5 4.1	0.03

D.6.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The total potential to emit particulate matter emissions are less than 25 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

(3) Condition D.7.1 has been modified as follows:

D.7.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), Nonattainment Area Particulate Limitations [326 IAC 6-1-2];

~~DaimlerChrysler Corporation - Kokomo Transmission Plant has the following limits:~~

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blasters shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process/Facility	Process Exhaust (scfm)	PM/PM ₁₀ Allowable Emissions (lbs/hr)	Rule Requirement gr/dscf
Shot Blaster 324739	16,000	0.5 4.1	0.03
Shot Blaster 199672	16,000	0.5 4.1	0.03
Shot Blaster 132544	16,000	0.5 4.1	0.03
Shot Blaster 220554	16,000	1.9 4.1	0.03
Shot Blaster 220544	16,000	1.9 4.1	0.03

D.7.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The total potential to emit particulate matter emissions are less than 25 tons per year and the total PM 10 emissions from the shot blaster unit identified as 324739 is less than 15 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

(4) Condition 9 has been modified as follows:

D.9.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

~~Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), Nonattainment Area Particulate Limitations [326 IAC 6-1-2];~~

~~(a) DaimlerChrysler Corporation - Kokomo Transmission Plant has the following limits:~~

Pursuant to 326 IAC 6-1-2 [Nonattainment Area Particulate Limitations] the shot blasters shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

Process / Facility	Process Exhaust (scfm)	PM / PM ₁₀ Allowable Emissions (lbs./hr)	Rule Requirement gr/dscf
Wheelabrator Shot Blaster Deburr (ID. #AAA006276)	4,350	1.08	0.03
Wheelabrator #22 Super III Tumblast (ID. #AAA012334)	16,000	1.3	0.03
Engineered Abrasive Shot Blaster (ID. # AAA018494)		0.13	0.03
Engineered Abrasive Shot Blaster (ID. # AAA018493)	2,000	0.06	0.03

~~Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 shall not apply.~~

D.9.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The total potential to emit particulate matter emissions are less than 25 tons per year and 15 tons per year of PM 10 emissions. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

SECTION D.5 - FACILITY OPERATION CONDITIONS

Comment 2:

D.5.8 - Record Keeping Requirements

- “(a) To document compliance with Condition D.5.1, the Permittee shall maintain records of daily visible emission notations as specified under Condition D.5.7.
- (b) To document compliance with Condition D.5.1, the Permittee shall maintain records of the results of the inspections required under Condition D.5.6.”

DaimlerChrysler believes that the Conditions are incorrectly cited. DaimlerChrysler suggests the following:

- “(a) To document compliance with Condition D.5.7, the Permittee shall maintain records of the results of the inspections required under Condition D.5.7.
- (b) To document compliance with Condition D.5.6, the Permittee shall maintain records of the results of the inspections required under Condition D.5.6.

Response to comment 2:

The OAM has made the corrections.

SECTION D.6 - FACILITY OPERATION CONDITIONS

Comment 3:

D.6.8 (now D.6.9) - Baghouse Inspections

The phrase “controlling the all shot blasting operations” should be changed to “controlling the associated shot blasting operations.”

Response to comment 3:

The OAM has made the change.

Comment 4:

As long as the unit is already shut down and not in operation (unless it qualifies as an emergency and the emergency requirements are satisfied), it should not be required that corrective actions be devised within a particular time of the discovery of the failure. The conditions should be changed to the following:

D.6.9 (now D.6.10) - Broken or Failed Bag Detection

“In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions)."

Response to comment 4:

The OAM will make the change.

Comment 5:

"D.6.11" should be changed to "D.6.10."

D.6.11 - Record Keeping Requirements

- "
- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records of daily visible emission notations as specified under Condition D.6.7.
 - (b) To document compliance with Condition D.6.1, the Permittee shall maintain records of the results of the inspections required under Condition D.6.6."

Response to comment 5:

The condition number shall remain the same since an additional condition (D.6.2) was include.

Comment 6:

DaimlerChrysler believes that the Conditions are incorrectly cited. DaimlerChrysler suggests the following:

- "(a) To document compliance with Condition D.6.7, the Permittee shall maintain records of the results of the inspections required under Condition D.6.7.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain records of the results of the inspections required under Condition D.6.6."

Response to comment 6:

The OAM has made the correction.

Comment 7:

D.6.12 - Reporting Requirements

"D.6.12" should be changed to "D.6.11."

Response to comment 7:

The condition number shall remain the same since an additional condition (D.6.2) was include.

SECTION D.7 - FACILITY OPERATION CONDITIONS

Comment 1:

D.7.8 (now D.7.9) - Record Keeping Requirements

- “(a) To document compliance with Condition D.7.1, the Permittee shall maintain records of daily visible emission notations as specified under Condition D.7.6.
- (b) To document compliance with Condition D.7.1, the Permittee shall maintain records of the results of the inspections required under Condition D.7.7.”

DaimlerChrysler believes that the Conditions are incorrectly cited. DaimlerChrysler suggests the following:

- “(a) To document compliance with Condition D.7.6, the Permittee shall maintain records of the results of the inspections required under Condition D.7.6.
- (b) To document compliance with Condition D.7.7, the Permittee shall maintain records of the results of the inspections required under Condition D.7.7.”

Response to comment 1:

The OAM has made the corrections.

Comment 2:

D.7.9 - Particulate Matter

DaimlerChrysler requests that this condition be removed as Section D.7.8 already requires the appropriate record keeping. Also, the PM and PM10 limitations were inconsistent with those specified in Section D.7.1.

“The pressure drop and flow rate of the scrubber or appropriate parameters determined in the compliance stack tests (as described in D.7.4) necessary to limit particulate matter emissions to 3.7 pounds per hour and PM10 emissions to 3.2 pounds per hour shall be monitored and recorded for shotblast unit 324739.”

Response to comment 2:

Since OAM has determined that DaimlerChrysler is subject to 326 IAC 6-1-2 and new limits have been determined, condition D.7.9 (Particulate Matter) is not applicable. The OAM shall delete condition D.7.9.

~~D.7.9 - Particulate Matter~~

~~The pressure drop and flow rate of the scrubber or appropriate parameters determined in the compliance stack tests (as describe in D.7.4) necessary to limit particulate matter emissions to 3.7 pounds per hour and PM10 emissions to 3.2 pounds per hour shall be monitored and recorded for shotblast unit 324739.~~

SECTION D.9 - FACILITY OPERATION CONDITIONS

Comment 1:

D.9.6 (now D.9.7)- Baghouse Inspections

The phrase "controlling the all shot blasting operations" should be changed to "controlling the associated shot blasting operations."

Response to comment 1:

The OAM will make the change.

Comment 2:

As long as the unit is already shut down and not in operation (unless it qualifies as an emergency and the emergency requirements are satisfied), it should not be required that corrective actions be devised within a particular time of the discovery of the failure. The conditions should be changed to the following:

D.9.7 (now D.9.8)- Broken or Failed Bag Detection

"In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions)."

Response to comment 2:

The OAM will make the change.

APPENDIX A

1. **Particulate matter in the form of oil mist from various machining operations** **Emission Unit - MACH, Segment - 1.**

Process Weight Rate Calculations: (please refer to the application, pages P126.XLS to P127.XLS, for further details)

According to DaimlerChrysler, records are maintained of amount of chips, turnings and aluminum scrap produced by the machining operations. As a conservative estimate, it is assumed that the machining removes 25 % of the part, by weight.

Annual chips, turnings, scrap - 52040 tons/yr, 5.94 tons/hr @ 8760

Estimate of machining process weight rate -

$$P = 5.94 \text{ tons/hr} / (1-.75) = 23.76 \text{ tons/hr}$$

$$E = 4.1 (P)^{0.67}$$

$$E = 4.1(23.76)^{0.67}$$

$$E = 34.25 \text{ lbs/hr} = 822.0 \text{ lbs/day} = 150.0 \text{ tons/yr}$$

Allowable	vs.	After control	
34.25 lbs/hr	greater than	16.3 lbs/hr	compliance with 326 IAC 6-3-2

Allowable	vs.	Before control
34.25 lbs/hr	less than	162.5 lbs/hr

PSD 326 IAC 2-2 does not apply since each facility is less than 250 tons/yr of PM.

2. **Cutting oils Emission Unit - MACH Segment -2**

Emission factor Calculation

VOC content range - 0 to 8.5 %

HAP - 0.1% in one cutting oil

Density range 7.67 to 8.34 lb/gal

VOC materials - Light and heavy hydro treated petroleum distillates, chlorinated solvent, sulfurized olefins.

Assume 25 % of the volatile component is emitted, similar to cold cleaning. Spent cutting oil is routed to the wastewater treatment plant after separation from the metal turnings. For formaldehyde, 100% is assumed to be emitted as a conservative estimate.

Overall VOC emission factor = Sum of individual oil VOC / gallons of oil used
= 37,699 lb/yr / 1,131,218 gal/yr
= 0.0333 lb VOC/gal

Formaldehyde - EF= (8.34 lb/gal)(0.001)(238,590 gal/1,131,218 gal) - 0.0018 lb formaldehyde/gal

Potential Usage rate Calculation: 1995 Usage - 1,131,218 gallons
Potential Usage: 1,131,218 gal x 2.54* = 2,873,294 gal/yr
Potential Fluid Usage Rate:
2,873,294 gal/yr / 8760 hr/yr = 328 gal/hr

328 gal/hr x 0.0333 lbVOC/gal = 10.9 lb/hr = 262.1 lbs/day = 47.8 tons/yr

No control * (See MACH, Segment 1 for production ratio calculation on page P126.XLS of the application)

Chrysler Corporation - Kokomo Transmission Plant & Casting Plant is considered to be as a single major source located in the Howard County. Sources or facilities that are located in the nonattainment counties listed in 326 IAC 6-1-7 and have potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year, shall comply with the limitations of 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified). Pursuant to 326 IAC 6-1-2(a), facilities shall not allow or permit discharge to atmosphere of any gases which contained particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf). **The Office of Air Management has determined that 326 IAC 6-1-2(a) is applicable to the source instead of 326 IAC 6-3-2(c).**

- 3. Walnut Shell Abrasive Cleaning Emission Factor** - Emission unit AC - Segment -1
No standard emission factor or stack test available. Conservatively assume that potential emissions are equal to the amount of shell consumed.

Calculations performed to determine compliance with 326 IAC 6-1-2 (a).

Limit from the rules	0.03 gr/dscf
acfm from the control	16,000
outlet of air	0.005 gr/scf

Allowable PM emissions

$0.03 \text{ gr/dscf} * 16000 \text{ scf/min} * \text{lb/7000 grain} * 60 \text{ min/hr} = 4.1 \text{ lbs/hr} = 98.4 \text{ lbs/day} = 18.0 \text{ tons/yr}$

Controlled emissions

$0.005 \text{ gr/dscf} * 16000 \text{ scf/min} * \text{lb/7000 grain} * 60 \text{ min/hr} = 0.68 \text{ lbs/hr} = 16.3 \text{ lbs/day} = 3.0 \text{ tons/yr}$

Since the controlled emissions are less than the limit of 4.1 lbs/hr, the shot blaster is in compliance with 326 IAC 6-1-2 (a).

4. Steel Shotblasting Emission Factor

The installation date of the shot blaster, mentioned below, predate August 7, 1977 for 326 IAC PSD 2-2 (PSD rule) review. However, the shot blasters shall comply with 326 IAC 6-1-2 limits.

Shot Blaster Number	Installation Date
NK5448	January 1965

The installation date of the shot blasters, mentioned below, were constructed after August 7, 1977 for 326 IAC PSD 2-2 (PSD rule) thus a PSD review is applicable.

Shot Blaster Number	Installation Date
180732	December 1977
132841	December 1977
180532	December 1977
180548	December 1977
199672	April 1984
132544	April 1985
220554	May 1988
220545	May 1988
324739	November 1996

The following calculations will show compliance with 326 IAC 6-1-2.

Shot blast machine number	Rule 326 IAC 6-1-2(a) gr/dscf	The Outlet grain loading of the control in gr/cf	The Gas or Air flow rate (cfm)	PM/PM10 allowable Emissions lbs/hr tons/yr	Controlled emissions lbs/hr	Compliance with rule 326 IAC 6-1-2 (a)
NK8991	0.03	0.005	16,000	4.1	0.7	yes
NK5448 January 1965	0.03	0.004	16000	4.1	0.5	yes
180732 December 1977	0.03	0.029	4000	1.0	1.0	yes
132641 December 1977	0.03	0.004	16000	4.1	0.5	yes
180532 December 1977	0.03	0.004	16000	4.1	0.5	yes
180548 December 1977	0.03	0.004	16000	4.1	0.5	yes
199672 April 1984	0.03	0.004	16000	4.1	0.5	yes
132544 April 1985	0.03	0.004	16000	4.1	0.5	yes
220554 May 1988	0.03	0.014	16000	4.1	1.9	yes
220545 May 1988	0.03	0.014	16000	4.1	1.9	yes
324739 November 1996	0.03	0.004	16000	4.1	0.5	yes

Methodology

$(\text{gr/dscf}) * (\text{gr/cf}) * (\text{cf/minute}) * \text{lb/7000 grains} * 60 \text{ min/hr} = \text{lbs/hr}$

5. Dynamometer Potential Fuel Usage - Emission Unit - DYNA Segment -1

Maximum rate (unit/hr) 1000 gal/hr 0.025

Emission Factor (lb/unit) lb/1000 gal

Emission Factor source

Emission Factor source

Dynamometer

PM 6.47, PM10 6.2, SO2 5.31, NOx 180, CO 3120

SCC 2-03-003-01

American Automobile Manufacturers association

Testing - VOC 160 lb/1000gal

1. PM - $0.025 \text{ 1000gal/hr} \times 12.6 \text{ lb/1000gal} = 0.31 \text{ lb/hr} = 7.4 \text{ lbs/day} = 1.4 \text{ tons/yr}$
2. PM10 - $0.025 \text{ 1000gal/hr} \times 12.6 \text{ lb/1000gal} = 0.31 \text{ lb/hr} = 7.4 \text{ lbs/day} = 1.4 \text{ tons/yr}$
3. SO2 - $0.025 \text{ 1000gal/hr} \times 10.5 \text{ lb/1000gal} = 0.26 \text{ lb/hr} = 6.2 \text{ lbs/day} = 1.1 \text{ tons/yr}$
4. NOx - $0.025 \text{ 1000gal/hr} \times 20.5 \text{ lb/1000gal} = 5.1 \text{ lb/hr} = 122.4 \text{ lbs/day} = 22.3 \text{ tons/yr}$
5. VOC - $0.025 \text{ 1000gal/hr} \times 160 \text{ lb/1000gal} = 4.0 \text{ lb/hr} = 96 \text{ lbs/day} = 17.5 \text{ tons/yr}$
6. CO - $0.025 \text{ 1000gal/hr} \times 7.900 \text{ lb/1000gal} = 197.5 \text{ lbs/hr} = 4740 \text{ lbs/day} = 865.1 \text{ tons/yr}$

Determining PSD

Facility	Brass tag Number	Installation Date	PSD required
Chassis Dynamometer	NK2876	1956	no Predates PSD rule 326 IAC 2-2
Dynamometer	NK2875	1956	no Predates PSD rule 326 IAC 2-2
Dynamometer	NK8519	1959	no Predates PSD rule 326 IAC 2-2
Chassis Dynamometer	116921	1969	no Predates PSD rule 326 IAC 2-2
Dynamometer	199714	1983	PSD 326 IAC 2-2 does not apply since emissions are less than 250 tons/yr
Dynamometer	213392	1985	PSD 326 IAC 2-2 does not apply since emissions are less than 250 tons/yr

0.025 1000 gal/hr / 4 dynamometers = 0.00625 1000gal/hr

1. 1983 CO - 0.00625 1000 gal/hr x 7900 lb/1000gal = 49.4 lb/hr = 1185.6 lbs/day = 216.4
2. 1985 CO - 0.00625 1000 gal/hr x 7900 lb/1000gal = 49.4 lb/hr = 1185.6 lbs/day = 216.4

6. Degreasing: Cold cleaners Emission Unit

Emission Factor Calculation

VOC - 100%

HAP - None

Density - 6.439

solvent is used in small basins for cleaning parts. It is conservatively assumed that 20% of the solvent evaporates at the basin.

Spent solvent is sent to the wastewater treatment plant for oil recovery. It is assumed that 5% of the solvent purchased evaporates during wastewater treatment.

A small amount of solvent is used to clean up at the paint booth, and is drummed for off-site disposal. (440 gal/year)

1995 usage - 16,775 gal (108,014)

Evaporation at basins - (16,775)(0.20) = 3,355 gal (21,602lb)

To disposal - 440 gal (2,833 lb)

Evaporation at WWTP - (16,775 gal)(0.05) = 839 gal (5400)

VOC EF = $\frac{21,602 + 5,400 \text{ lb}}{16,775 \text{ gal purchased}}$ = 1.61 lb VOC emitted/ gal purchased

Potential Usage Rate Calculation

1995 Usage - 16,775 gallons

Potential Usage: 16,775 gal x 2.54 = 42,609 gal/yr

Potential Usage Rate:

42,609 gal/yr / 8760 hr/yr = 4.86 gal/hr

Emissions:

4.86 gal/hr x 1.61 lb VOC emitted/gal purchased = 7.8 lbs/hr = 187.8 lbs/day = 34.3 tons/yr

NESHAP rules do not apply since no halogenated solvent degreasing chemicals are not present.

7. Sulfur Dioxide Emission Limitations 326 IAC 7-1.1-2 for Boilers 1, 2, and 3

AP42 Table 1.1-1 38(% Sulfur)
Sulfur 1.45 %
Heating Value 11943 Btu/lb = 0.011943 Btu/lb
Emission limit for SO₂ is 6.0 pounds per million Btu for coal combustion

$0.011942 \text{ MMBtu/lb} \times 2000 \text{ lb/ton} = 23.9 \text{ MMBtu/ton}$

$\text{lbs SO}_2/\text{MMBtu} = 38 (1.45)/23.9 \text{ MMBtu/ton}$

$\text{lbs SO}_2/\text{MMBtu} = 2.3$

$6.0 \text{ lbs SO}_2/\text{MMBtu} > 2.3 \text{ lbs SO}_2/\text{MMBtu}$ this meets 326 IAC 7-1.1-2

8. Sulfur Dioxide Emission Limitations 326 IAC 7-1.1-2 for boiler 4

AP42 Table 1.3-2 38(% Sulfur)
Sulfur 1.12%
Heating Value 140,000 lbs/gal
Emission limit for SO₂ is 1.6 lbs/MMBtu for oil combustion

$\text{lbs SO}_2/\text{MMBtu} = 142 \text{ lbs/1000gal} (1.12)/ 140,000,000 \text{ Btu/1000 gal}$

$\text{lbs SO}_2/\text{MMBtu} = 159.04\text{lbs}/140,000,000 = 1.1 \text{ lbs/MMBtu}$

$1.6 \text{ lbs/MMBtu} > 1.1 \text{ lbs/MMBtu}$ this meets 326 IAC 7-1.1-2

9. Particulate Matter Limitations: Howard County 326 IAC 6-1-15 For boilers 1, 2, and 3

AP-42 Table 1.1-3 66 lb/ton
Heating value 11943 Btu/lb of coal
Total MMBtu/hr 141
Coal usage 51,710.6 tons/yr
Control % 80%

$141 \text{ MMBtu/hr} \times 1 \text{ lb of coal} / 0.011943 \text{ MMBtu} = 11,806.1 \text{ lb of coal/hr} \times 8760 \text{ hr/yr} \times \text{ton}/2000 \text{ lbs} = 51,710.6 \text{ ton of coal /yr}$

$51,710.6 \text{ tons of coal/yr} \times 66 \text{ lb/ton of PM} / 2000 \text{ lb/ton} = 1706.4 \text{ tons/yr uncontrolled potential}$

$1706.4 \text{ tons/yr} \times (0.20) = 341.3 \text{ tons/yr}$

$341.3 \text{ tons of PM/yr} \times \text{yr}/51,710.6 \text{ tons of coal} \times 2000 \text{ lbsPM/ tons PM} \times \text{tons of coal}/2000 \text{ lb Coal} \times \text{lb coal}/11943 \text{ Btu} = 0.55 \text{ lb/MMBtu}$

Allowable limit Controlled Potential
 $0.75 \text{ lb/MMBtu} > 0.55 \text{ lb/MMBtu}$ Complies with 326 IAC 6-1-15

Total Potential Emissions for CWOP/OWOP facilities are as follows:

Facilities	PM 10 Tons/yr	SO2 Tons/yr	NOx Tons/yr	VOC Tons/yr	CO Tons/yr
1) Particulate matter in the form of oil mist from <i>various</i> machining operations Emission Unit - MACH, Segment - 1	less than 250	n/a	n/a	n/a	n/a
2) Cutting oils Emission Unit - MACH Segment -2	n/a	n/a	n/a	47.8	8
3) Walnut Shell Abrasive Cleaning Emission Factor -AC-1	less than 250	n/a	n/a	n/a	n/a
4) Steel Shotblasting Emission Factor - AC-2 Shot Blaster ID as 199672, 132544, 220554, 220545,	each is less than 250	n/a	n/a	n/a	n/a
5) Dynamometer Potential Fuel Usage - Emission Unit - DYNA Segment -1	1.4	1.1	22.3	17.5	865.1
6) 40 Heating units, HT1, Segment ID 1	4.7	0.2	47.7	1.0	11.9
7) Degreasing: cold cleaners	n/a	n/a	n/a	34.3	n/a

No PSD review is necessary for the CWOP and OWOP facilities since each facility is less than 250 tons per year of emissions.